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United States
Department of
Agriculture

Forest Service

Tongass
National
Forest
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CASCADE POINT ACCESS ROAD

FINAL ENVIRONMENTAL IMPACT STATEMENT

**COOPERATING AGENCY:**

US ARMY CORPS OF ENGINEERS

RECORD OF DECISION USDA FOREST SERVICE

Cascade Point Access Road Final Environmental Impact Statement Juneau Ranger District Tongass National Forest - Chatham Area

This RECORD OF DECISION documents my decision concerning whether or not to authorize issuing a road easement to Goldbelt, Inc. for construction, operation and maintenance of a 2.5 mile road across National Forest System land to access their private land near Echo Cove in Juneau, Alaska. This decision is based upon the analysis in the Final Environmental Impact Statement.

ALTERNATIVES SELECTED FOR DETAILED EVALUATION

Three alternatives were evaluated, including the No Action Alternative. The range of alternatives addressed the major issues associated with this project.

The alternatives are summarized as follows:

Alternative A - No Action

Alternative A would deny the applicant's request for a road easement on the proposed alignment across National Forest System land. Alternative methods of access, outside the jurisdiction of the Forest Service, are technically feasible.

Alternative B - Proposed Action

Alternative B would authorize issuance of a road easement to Goldbelt, Inc. for the purpose of construction, operation and maintenance of a 2.5 mile access road to private land across National Forest System land for the purpose of development. The new road would be gated, restricting public vehicular traffic, during construction and until any one of the planned public facilities was constructed on private land at Cascade Point.

Alternative C - Access Road with no Public Access

Alternative C would be physically similar to Alternative B, with the exception that permanent gates with gate-keepers would be placed at the beginning of the access road and at the point where the access road enters Goldbelt, Inc. private land thus restricting public access.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The definition of environmentally preferred is the alternative which causes the least damage to the biological and physical environment, and which best protects, preserves and enhances historic, cultural, and natural resources.

The environmentally preferred alternative is Alternative A - No Action, if Goldbelt, Inc. were to abandon attempts to access their land or utilize water access. If Alternative A were selected and Goldbelt, Inc. were to subsequently use land-based access avoiding the National Forest, then the environmentally preferred alternative would be Alternative C since it restricts increased public access and indirect impacts to wildlife.

DESCRIPTION OF THE FOREST SERVICE PREFERRED ALTERNATIVE

The Forest Service preferred alternative will be used in the development of the authorization for the issuance of a road easement.

Based on the analysis and the evaluation in the Final Environmental Impact Statement for the Cascade Point Access Road, it is my decision to select Alternative B - Proposed Action with the following modifications:

1. Signs will be installed delineating National Forest System land from private land along the road at each point where adjacent ownership changes.
2. Public vehicular use of the road will be allowed upon completion of the access road and initial dock development including a log transfer facility, as described in the initial phase of the Goldbelt, Inc. Echo Cove Master Plan whenever on-going development activities, in the opinion of the Forest Service, in collaboration with Goldbelt, Inc., do not create hazards to public safety. This will provide for public use of the road while providing measures for public safety.
3. A turnout will be constructed adjacent to the road on the National Forest System land where public land extends to the beach. A turnout at this point will provide the public with a place to park allowing access and use of public land off the new access road.
4. During ground disturbing activities associated with construction of the access road a qualified archeologist will be on-site to actively monitor for cultural resources. Protection of possible cultural resources in the road corridor and clearing limits is a priority. Monitoring by a qualified archeologist during construction will ensure that any sites that may be uncovered will be protected.

RATIONALE FOR THE DECISION

I selected Alternative B because it best addresses issues identified during scoping and Forest Service policy.

Alternative B would allow Goldbelt, Inc. the opportunity to develop their private land at Cascade Point. It meets ANILCA direction of granting access to private land without reducing management options or significantly damaging National Forest System land or resources. The road corridor through Goldbelt, Inc. land was acquired by the Forest Service for the purpose of access. In addition, construction of the road will increase public access to National Forest System lands.

The road route in Alternative B was chosen because environmentally it is the best location of a road. If the land-based road route of the Juneau Access project were constructed, the selected route is suitable for that road and could eliminate the need for two separate routes.

Providing a turnout on the road on National Forest System land where there is beach access will provide the public with greater access to public lands. During public meetings, we heard the public say that it was important to maintain this beach access.

My decision to allow public vehicular use of the road upon completion of the initial dock development and log transfer facility rather than after construction of public facilities, as described in Alternative B, would give the public earlier access. Also if construction of these public facilities were delayed, the public will still have access to public lands. This condition also recognizes the need for closure when hazards are present.

I did not select Alternative A - No Action because it either forces Goldbelt, Inc. to restrict their proposed development at Cascade Point or could lead to road construction outside of National Forest System land which could have undesirable environmental effects. Since Goldbelt, Inc. has indicated that they would pursue construction of the road on private land along the beach under Alternative A - No Action if the easement were denied, this alternative has potential for greater impacts than Alternative B. The No Action Alternative would also not allow the public greater access to National Forest System lands.

I did not select Alternative C - Access Road With No Public Access since it would benefit only Goldbelt, Inc. and their shareholders. The public would not derive greater access to their public lands except for easier pedestrian access.

Considerable concern was expressed during preparation of this document about potential cumulative effects of the Cascade Point Road in conjunction with other proposed or potential projects in the Berners Bay area. The Final EIS includes an expanded discussion addressing this concern. While construction of the road will likely lead to some level of future development on private land at Cascade Point, selection of the No Action Alternative would not preclude a similar level of development. The alternative which I have selected results in very little direct effect to Berners Bay. It does have a direct relationship to both the development at Cascade Point and the Juneau Access Improvements. I recognize the possibility that other relationships could develop at some unspecified future date if development of other projects were to proceed, such as development of the Jualin Mine or changes to employee housing and transportation at the Kensington Gold Project were proposed. New projects or changes to existing projects would require environmental analysis prior to their approval. That analysis would also include cumulative effects associated with those projects and the Cascade Point development and road easement.

PUBLIC INVOLVEMENT

In January and February of 1996, the Forest Service began scoping which included: (1) meeting with state and federal resource agencies; (2) letters mailed to over 200 individuals, organizations, and agencies; and (3) open house public meeting. Seventy-one letters and three telephone calls were received in response to the meeting and response to comments. After the decision to prepare an EIS was made, scoping included: (1) letters mailed to 265 individuals, organizations, and agencies in May, 1996; (2) Notice of Intent published in the Federal Register June 27, 1996;

and (3) State of Alaska, Division of Governmental Coordination, request for comments from state agencies June 4, 1996. In response to the second scoping effort, four letters and two telephone calls were received from the public and six letters and one telephone call were received from city, state, and federal agencies.

Meetings with local residents from the Native community were held on March 10, 1997, with ten people attending. On December 19, 1997, the Notice of Availability was published in the Federal Register and a public notice was published in the Juneau Empire stating that the Draft EIS was available to the public. The Draft EIS was mailed to the public December 17, 1997. The comment period ended on February 9, 1998. Ninety-six comment letters were received on the draft and used to develop the Final EIS.

MITIGATION AND MONITORING

The Final EIS identifies mitigation measures that are designed to ensure that all practicable means have been adopted to avoid or minimize potential environmental impacts from the selected alternative within the terms of the road easement. Chapter 2, Mitigation, lists the mitigation measures common to all action alternatives. As noted in the Final EIS, I have decided to add a requirement for on-site monitoring for cultural resources during road construction.

Monitoring will determine compliance of the project with terms of the road easement and validate projected environmental effects of the project.

FINDINGS REQUIRED BY OTHER LAWS

Tongass Land and Resource Management Plan

This decision is consistent with the Tongass Land and Resource Management Plan (1997). The site is located in Land Use Designation, Scenic Viewshed, which applies the Visual Quality Objectives of Retention and Partial Retention and offers semi-primitive to roaded opportunities for recreation and tourism. The goal of a Scenic Viewshed designation is to "provide a sustained yield of timber and a mix of resource activities while minimizing the visibility of developments as seen from Visual Priority Routes and Use Areas."

ANILCA Section 810, Subsistence Evaluation and Finding

The effects of this project have been evaluated to determine potential effects on subsistence opportunities and resources. There is no documented or reported subsistence use that would be restricted as a result of this decision.

Coastal Zone Management Act of 1972, as amended

Coastal Zone Management Act of 1972, as amended requires the Forest Service, when conducting or authorizing activities or undertaking development directly affecting the coastal zone, to insure that the activities or development be consistent with the approved Alaska Coastal Management Program to the maximum extent practicable. I have determined that the proposed activities are consistent with the enforceable policies of the Alaska Coastal Management Program to the maximum extent practicable.

Endangered Species Act of 1973

A biological evaluation has been completed for this action which indicates that no Federally listed threatened or endangered species will be affected by this decision.

National Historic Preservation Act of 1966

The Forest Service program for compliance with the National Historic Preservation Act includes locating, inventorying and nominating all cultural sites that may be directly or indirectly affected by scheduled activities. This activity has been reviewed by a qualified archeologist and a determination made that no cultural resources are present in the road corridor; however, active on-site monitoring will be conducted during construction should any cultural resources be found.

Floodplain Management (E.O. 11988)

This activity is not located within floodplains as defined by Executive Order 11988. This action has been designed to minimize potential harm to or within the floodplains.

Protection of Wetlands (E.O. 11990)

This activity is located within wetlands as defined in the Executive Order 11990. I have determined that (1) there is no practicable alternative to such construction, and (2) that the selected alternative includes all practicable measures to minimize harm to wetlands which may result from such use.

Environmental Justice (E.O. 12898)

I have determined that in accordance with Executive Order 12898 this project does not have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations.

IMPLEMENTATION DATE

Implementation of decisions made by the Chatham Area Forest Supervisor, which are subject to appeal pursuant to 36 CFR part 215, may occur on, but not before, five (5) business days from the close of the appeal filing period. The appeal filing period closes forty-five (45) days after publication of legal notice of this decision in the *Juneau Empire* newspaper, published in Juneau, Alaska.

RIGHT TO APPEAL OR ADMINISTRATIVE REVIEW

This decision is subject to administrative review (appeal) pursuant to 36 CFR Part 215. A written notice of appeal must be filed with the Appeal Deciding Officer:

Phil Janik, Regional Forester
Regional Office
P.O. Box 21628
Juneau, Alaska 99802-1628

The Notice of Appeal must be filed within forty-five (45) days of publication of notice of this decision in the *Juneau Empire*.

In accordance with 36 CFR Section 215.14, it is the responsibility of those who appeal this decision to provide the Appeal Deciding Officer sufficient evidence and rationale to show why

the Responsible Official's decision should be remanded or reversed. The written notice of appeal filed must meet the following requirements:

1. State that the document is a Notice of Appeal pursuant to 36 CFR part 215.
2. List the name, address, and telephone number of appellant;
3. Identify the decision document by title and subject, date of the decision, and name and title of the Responsible Official;
4. Identify the specific change(s) in the decision that the appellant seeks or portion of the decision to which the appellant objects;
5. State how the Responsible Official's decision fails to consider comments previously provided and, if applicable, how the appellant believes the decision violates the law, regulation, or policy and, if applicable, specifically how the decision violates the law, regulation, or policy.

CONTACT PERSON

Jennette C. de Leeuw
Minerals Management Specialist
Juneau Ranger District
(907) 790-7445


GARY A. MORRISON
Chatham Area Forest Supervisor

3-10-98
Date

SUMMARY

CASCADE POINT ACCESS ROAD

FINAL ENVIRONMENTAL IMPACT
STATEMENT

SUMMARY

PURPOSE AND NEED

INTRODUCTION The US Forest Service has received an application for a road easement from Goldbelt, Inc., an urban Native Corporation. The easement would allow Goldbelt, Inc. to construct, maintain, and operate a 26 foot wide road on National Forest System land in the vicinity of Echo Cove for the purpose of development of their land. The road would be constructed from the northern terminus of Glacier Highway for a distance of approximately 2.5 miles to Goldbelt, Inc. private land at Cascade Point. This is a summary of a Final Environmental Impact Statement that has been prepared to disclose the impacts of the proposed access road. The US Army Corps of Engineers is a cooperating agency in the EIS, with regulatory authority over wetland and tidal fills proposed for the road.

AREA LOCATION AND BACKGROUND Echo Cove is located approximately 42 miles north of downtown Juneau, Alaska, at the northern terminus of the local road system. Cascade Point is approximately three miles further north, in Berners Bay, and near the northern boundary of Goldbelt, Inc. landholdings. The proposed road alignment would follow a forested bench on a 100 foot wide strip of National Forest System land which passes through Goldbelt, Inc. property.

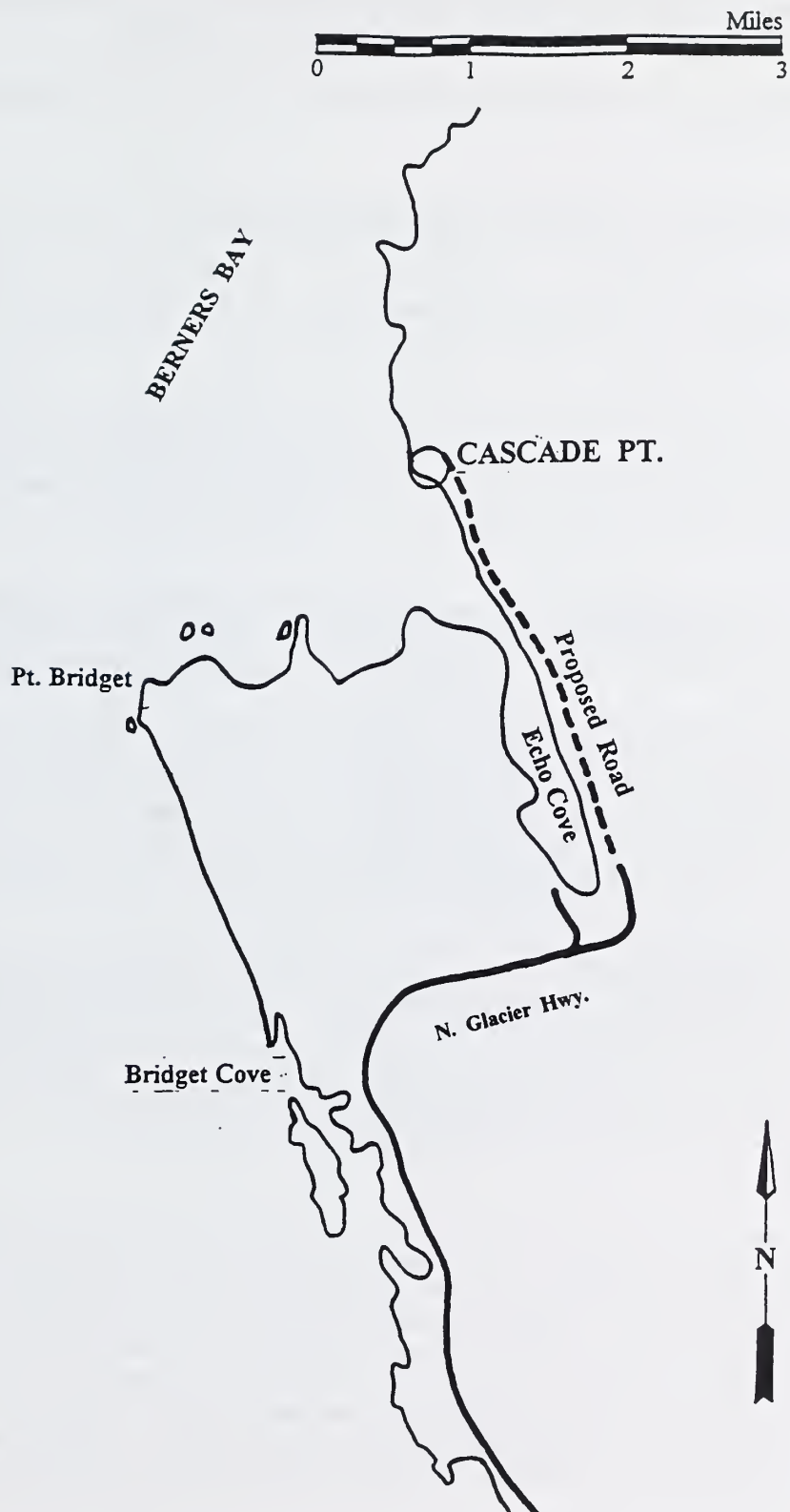
PURPOSE AND NEED The purpose of the proposed action is to provide Goldbelt, Inc. access across National Forest System land to their private land.

PROPOSED ACTION The Forest Service proposes to grant a road easement for construction, operation and maintenance of a road on National Forest System land. The road would extend from the existing northern terminus of Glacier Highway for a distance of approximately 2.5 miles to Cascade Point (Figure S-1, Proposed Access Road Route). Although the road would be open to public pedestrian travel, it would be closed to public vehicular travel until any of the planned public facilities are constructed at Cascade Point. The planned public facilities on Goldbelt Inc.'s private land consist of a lodge, a fast ferry facility, commercial fishery support, and a convenience store/gas station. The Forest Service does not regulate actions on private land. The US Army Corps of Engineers regulatory authority would include the consideration of permits for fill in wetlands and the construction of structures in navigable waters, both along the proposed access road and at Cascade Point.

SIGNIFICANT ISSUES The following significant issues were identified during public and agency scoping.

Issue 1: The proposed road and increased use of the area could result in impacts to recreational activities in the adjacent public land.

FIGURE S-1 - PROPOSED ACCESS ROAD



Issue 2: The proposed road and increased use of the area could impact wildlife resources in the area.

Issue 3: The proposed road and increased use of the area could impact fisheries resources.

Alternatives, Including the Proposed Action

Introduction

This chapter describes and compares reasonable alternatives to the Proposed Action.

Alternative A - No Action

Under the No Action Alternative the Forest Service would not issue the road easement special use permit for construction of an access road to Cascade Point. Also, US Army Corps of Engineers (USACOE) would not issue required authorization under Section 404 of the Clean Water Act for construction of the access road.

Alternative B - Proposed Action

Under this alternative, all necessary Forest Service road easement special use permits would be issued to Goldbelt, Inc. for construction, operation, and maintenance of the access road on National Forest System land to Cascade Point.

The access road would consist of a 26 foot wide gravel surfaced road, with a clearing limits from 70 to 100 feet wide, from the terminus of Glacier Highway for a distance of approximately 13,400 feet (2.5 miles). The road would then depart from National Forest System land and be constructed on Goldbelt, Inc. land for another 2,400 feet (0.5 miles) to the proposed development site at Cascade Point. The proposed activity at Cascade Point would initially consist of an equipment and log transfer bulkhead on the beach and a log staging area in the uplands.

Vehicular use of the access road would be allowed only after appropriate public facilities had been constructed on private land at Cascade Point in the proposed second phase of development. These public facilities could include any one of the following: a lodge, a fast ferry operation, a commercial fishing support dock, or a convenience store/gas station. Public pedestrian access would be allowed on the access road upon completion of construction of the road after safety concerns related to the road construction equipment and activity are eliminated.

Alternative C - Access Road With no Public Access

This alternative would be physically similar to the Proposed Action, with the exception that permanent gates with gate-keepers would be placed at the beginning of the access road, and at the point where the access road enters Goldbelt, Inc. private land (approximately 0.5 miles from Cascade Point). The use of the access road would be restricted to traffic traveling to and from Goldbelt, Inc. private land for the use of those facilities. Pedestrian access would be allowed on the access road. This alternative would address the three significant issues discussed above. Impacts to recreational opportunities on public lands would be decreased by limiting public access to pedestrian travel. In addition, impacts to wildlife and fish would be addressed by

limiting the possibilities of vehicular conflicts with wildlife, as well as by limiting the possibilities for degradation of water quality on National Forest System land by those using vehicular access.

Table S-1

Comparison of Alternatives by Component

Component	Alternative A No Action	Alternative B Proposed Action	Alternative C
Access Road (Forest Service Decision)	None on National Forest System land, possible road on Goldbelt, Inc. land / State of Alaska tidelands, or marine access.	On Forest Service alignment	Same as Alternative B.
Development at Cascade Point (Non-Forest Service Decision)	Ranges from no development to same as Alternative B.	Phase 1: access road, initial dock development including log transfer facility, Phase 2: lodge, high speed ferry, fisheries support, grocery, service station, garage and utility building.	Same as Alternative B.
Access to National Forest System Lands (Forest Service Decision)	Same as existing access.	Pedestrian access on road, public vehicular access when any one of the planned public facilities at Cascade Point is completed.	Pedestrian access on road, no public vehicular access.

Table S-2

Comparison of Alternatives by Issue

Issue	Alternative A No Action/No Development	Alternative A No Action/ Development	Alternative B Proposed Action/No Development	Alternative B Proposed Action with Development	Alternative C Gated Road with Development
Impacts to Wildlife	None	22% reduction of modeled brown bear carrying capacity, 13% reduction of modeled marten carrying capacity, less than 2% reduction of modeled black bear carrying capacity, less than 1% reduction of mountain goat carrying capacity (if lodge constructed)	1% reduction of modeled brown bear carrying capacity, 10% reduction of modeled marten carrying capacity, 4% reduction of modeled black bear carrying capacity, less than 1% reduction of modeled mountain goat carrying capacity	23% reduction of modeled brown bear carrying capacity, 23% reduction of modeled marten carrying capacity, less than 6% reduction of modeled black bear carrying capacity, less than 1% reduction of mountain goat carrying capacity (if lodge constructed)	The impacts to wildlife from this alternative are assumed to be marginally <u>less</u> than Alternative B, because one factor used in computation of reduction in habitat carrying capacity is based on vehicular traffic access, which would be somewhat <u>less</u> with this alternative.
Impacts to Fish	None	Impact to saltwater species along Echo Cove shoreline and Cascade Point	None	Impact to saltwater species at Cascade Point only	Impact to saltwater species at Cascade Point only
Impacts to Recreational Activities	None	No change from existing on National Forest System land. May lead to increased use of Sawmill Creek area; increased noise and visual impact along road corridor.	Consistent with Forest Service Visual Quality Objectives, may lead to increased use of Sawmill Creek area; increased noise and visual impact along road corridor.	Consistent with Forest Service Visual Quality Objectives, may lead to increased use of Sawmill Creek area; increased noise and visual impact along road corridor.	Restricts public vehicular traffic on access road. May lead to less increased use of Sawmill Creek area than Proposed Action.

Affected Environment

The study area is comprised of a strip of land beginning near the head of Echo Cove, at the end of Veterans Memorial (Glacier) Highway, and extending northerly approximately three miles to the point in Berners Bay shown on nautical charts as "Cascade". The focus of the environmental document is a 100 foot wide strip of National Forest System land that parallels the shoreline approximately 1/4 mile inland. The proposed road alignment crosses both National Forest System land and Goldbelt, Inc. land, and generally follows a bench at an elevation of approximately 200 feet above sea level.

The area is comprised of a relatively homogeneous physical terrain, with a moderate to steep slope up from tidewater to the proposed road alignment, and mountainous terrain up slope of the alignment. The Cascade Point area is the only relatively flat land in Goldbelt, Inc. ownership that is outside of Echo Cove. Vegetation is characterized by a mature spruce/hemlock forest with forested wetlands on poorer drained soils. A number of small, clear and steep streams cross the alignment.

The tidelands and near-shore forests are used by Goldbelt, Inc. shareholders and their families for many recreational and subsistence activities, while the public uses the tidelands and the City and Borough of Juneau boat launch area and dispersed camping area at the head of Echo Cove for recreation activities. Access to Goldbelt, Inc. land is by permit from Goldbelt, Inc. only.

Environmental Consequences

This section discusses anticipated environmental effects associated with the Proposed Action and other action alternatives with respect to the existing environment as well as in comparison to the No Action Alternative. Impact analysis discussions are grouped to address the three significant issues raised in scoping, as well as other regulatory requirements, impacts to wetlands, subsistence and cultural resources. The three significant issues discussed are: impacts to wildlife, fish, and recreational activities.

In addition, cumulative impacts are addressed, taking into account other reasonably foreseeable actions in the Berners Bay area, including:

- Cascade Point Development
- Jualin Mine Exploration
- Kensington Gold Project
- Juneau Access Improvements
- Lace River Hydroelectric Project
- Goldbelt, Inc./Forest Service Land Exchange

Issue 1, Impacts to Wildlife

Impacts on Management Indicator Species (MIS); brown bear, black bear, mountain goat, and marten; are based on calculated reductions in habitat capability. The habitat capability reductions are calculated using three types of impact categories: permanent loss of habitat, permanent displacement of animals, and temporary disturbance of animals. These reduction factors can extend for up to five miles into surrounding habitat, depending on which species is modeled.

Impacts to bald eagles are based on proximity of development to nest trees. A distance of 330 feet has been accepted as sufficient to avoid impacts or disturbance to bald eagles and their nests.

Alternative A - No Action

Selection of the No Action Alternative would not allow construction of the road on National Forest System land as described in the Proposed Action. This would eliminate any effects on wildlife due to the road construction and road, as described above.

Development of the private land at Cascade Point could still occur with selection of the No Action Alternative and would result in impacts to wildlife.

Alternative B - Proposed Action

Wildlife impacts for the Proposed Action are based on the development of the proposed access road, as described above.

In the Wildlife Analysis Area (WAA) encompassing the project study area, the analysis shows reductions in the assumed carrying capacity of MIS as follows:

Brown bears - reduction of 1% of the assumed carrying capacity.

Black bears - reduction of 4% of the assumed carrying capacity.

Mountain goats - reduction of less than 1% of the assumed carrying capacity.

Marten - reduction of 10% of the assumed carrying capacity.

Analysis shows no probable impacts to bald eagles, because no nests are located within 330 feet of the proposed access road.

Alternative C

The modeled wildlife impacts of this alternative are the same as those of the Proposed Action. However, the characteristic of decreased vehicular access that distinguishes this alternative from the Proposed Action would tend to decrease wildlife disturbance along the access road corridor. There would be no probable impacts to bald eagles.

Issue 2, Impacts to Fish

Alternative A - No Action

Selection of the No Action Alternative would not allow construction of the road on National Forest System land as described in the Proposed Action. This would eliminate any effect on fish due to the road construction and use.

Development of the private land at Cascade Point could still occur with selection of the No Action Alternative and would result in impacts to fish.

Alternative B - Proposed Action

On National Forest System land, the proposed access road crosses no streams containing either anadromous or resident fish. Short term direct impacts to fish in saltwater downstream of the proposed road may occur as a result of short-term water quality impacts during construction in streams crossed by the proposed road. Operational impacts of the proposed road to fish are expected to be minimal.

Alternative C

This alternative would have the same construction impacts to fish as the Proposed Action, Alternative B. Operational impacts of this alternative may be less than the Proposed Action because of decreased vehicular access to Cascade Point.

Issue 3 - Impacts to Recreation Activity

Impacts to recreation activity can be split into three factors: visual, noise, and increased use of recreational resources. These factors contribute to the quality of recreational experience in the area.

Alternative A - No Action

Selection of the No Action Alternative would not allow construction of the road on National Forest System land as described in the Proposed Action. This would eliminate any effects on recreation due to road construction and road use.

Development of the private land at Cascade Point could still occur with selection of the No Action Alternative and would result in impacts to recreation.

Alternative B - Proposed Action

Visibility of the proposed access road would be apparent only to users of the road and very nearby surrounding forest. The visual impacts of the proposed access road would be consistent with the Forest Service Visual Quality Objective of Retention for the area.

An increase of noise levels from 47 dBA to 54 dBA could be expected at the CBJ boat ramp in Echo Cove, as a result of increased traffic on the access road. This increase in noise is well within Forest Service guidance for maximum increases in noise levels.

A third cause of concern for local recreationists is increased use of the Berners Bay resources due to increased use from the proposed access road. The focus of this concern is increased use of the Sawmill Creek area by pedestrians hiking to the area from the end of the proposed road, or from the proposed development at Cascade Point. Two possibilities for impact are disruption of bear viewing opportunities and increased negative human/bear encounters. Other possibilities for impact would include increased use of the area for camping and picnicking, with attendant possibilities for degradation of the natural environment by actions such as littering, improper disposal of human waste and improper maintenance of camp fires.

Alternative C

This alternative would be physically the same as the Proposed Action. However, limiting vehicular access to those with business at the Cascade Point development would likely lessen the number of people hiking to the Sawmill Creek area. This would result in less recreation use and fewer impacts than discussed above, for Alternative B.

Wetlands

The No Action Alternative, in terms of wetlands, would mean the avoidance of all wetland impacts requiring Corps of Engineers authorization. This would limit possible activities to construction of a lodge and piling supported dock at Cascade Point, with marine access from Echo Cove.

Alternatives B and C would result in the filling of approximately seven acres of forested wetlands on National Forest System lands. A functional analysis of the wetlands shows high ratings for the functions of "disturbance sensitive wildlife" (mountain goats), and "ecological replacement cost" (a function related to the time it would take to regrow a mature forest). Given the factors of cost, logistics, and overall project need, wetlands along the proposed alignment cannot reasonably be avoided.

Subsistence

Subsistence is the traditional and customary use of fish and game and other renewable resources by rural Alaska residents. Residents of the City and Borough of Juneau are classified as non-rural and do not qualify as subsistence users. The project area is far from communities that are classified as rural.

Cultural Resources

An archaeological survey along the proposed access road alignment and Cascade Point development area found a large number of culturally modified trees (CMTs) and a small historic or prehistoric temporary camp site on Goldbelt, Inc. land. The small camp site as well as a grove of culturally modified trees has been determined eligible for listing in the National Register of Historic Places as a site that may yield information important in prehistory or history.

Should no action be taken, there would be no impact on cultural resources.

The effects on cultural resources of Alternatives B or C would be the same. A Determination of Effect for the camp site described above is being sought from the

State Historic Preservation Office. Proposed mitigation for impacts to cultural resources is as follows (Goade, 1997):

- Goldbelt, Inc. has committed to carrying out chronological research on the site, including dating of carbon-based material from the camp site and dating of tree sections from the CMTs.
- The campsite would be avoided with proposed development.
- CMTs would be mapped and documented before clearing activities.
- An interpretive display in the proposed lodge would explain the significance of historic or prehistoric cultural resources in the area.

Cumulative Effects

Cumulative impacts are defined as "... the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (CEQ, 1986).

This effect category, as with the other sections of this summary, is discussed in detail in the Cascade Point and Access Road Final Environmental Impact Statement.

Cumulative impacts of the reasonably foreseeable activities listed in the Introduction to this Environmental Consequences Section were analyzed in addition to Alternative B, the Proposed Action.

Wildlife

While the modeled impacts on the four Management Indicator Species (MIS) discussed earlier in this summary would be small when considered in the context of the Bowers Bay area, the cumulative impacts of all the reasonably foreseeable actions would be much more substantial. Because brown bears and marten are more susceptible to impacts from increased access and activity, those species would have modeled reductions in habitat capability surrounding Bowers Bay of 42% and 55%, respectively. Black bears and mountain goats would have less reduction in habitat capability with reductions of 14% and 7%, respectively.

Fish

The proposed Cascade Point access road would have no direct impacts on fish, and minimal construction related water quality effects downstream of the road. Of the reasonably foreseeable actions listed, only the Cascade Point development and the Juneau Access Improvements would contribute to fish habitat impacts of the Proposed Action. The cumulative effect of these activities would probably be within the normal range of water quality changes in the project area.

Recreational Activities

Cumulative effects from the proposed access road, in combination with any of the other actions proposed for the Bemers Bay area would likely result in increased noise and some lowering of visual quality. These impacts could lessen the recreation experience of visitors. Cumulative effects to recreation in Bemers Bay could consist of increased ferry, barge, and boat traffic, as well as an increase in the number of people visiting the area and recreating there.

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Appendix A - Responses to Comments

Chapter 1

Purpose and Need for Action

Purpose and Need for Action

Introduction

The USDA Forest Service has received an application for a road easement from Goldbelt, Inc., an urban Native Corporation. The easement would allow Goldbelt, Inc. to construct, maintain, and operate a 26 foot wide road on National Forest System land in the vicinity of Echo Cove for the purpose of development of their land. The road would be constructed from the northern terminus of North Glacier Highway for a distance of approximately 2.5 miles to Goldbelt, Inc. private land at Cascade Point.

This Final Environmental Impact Statement has been prepared to disclose the impacts of the proposed access road, as required by the National Environmental Policy Act. The U.S. Army, Corps of Engineers (USCOE) is a cooperating agency in the EIS, with regulatory authority over wetland and tidal fills proposed for the road.

Area Location

Echo Cove is located approximately 42 miles north of downtown Juneau, Alaska, at the northern end of North Glacier Highway, the northern terminus of the local road system. Cascade Point is approximately three miles further north, in Berners Bay, and near the northern boundary of Goldbelt, Inc. land holdings. The proposed road alignment would follow a forested bench at an elevation of 100 to 200 feet above sea level. The Cascade Point development site is a gently sloping forested area located on a small bight in Berners Bay, near Cascade Creek (Figure 1-1, Location Map).

Goldbelt, Inc. owns approximately 1,400 acres of land surrounding Echo Cove and extending north along Berners Bay to just north of Cascade Point (Figure 1-2, Echo Cove Land Ownership).

The Forest Service manages National Forest System land adjacent to Goldbelt, Inc.'s private land. The proposed access road alignment would include a 100 foot wide strip of National Forest System land which passes through Goldbelt, Inc. property. The history and management of this alignment is described below in the "Background" section.

Background

In 1980, approximately 2,700 acres of land surrounding Echo Cove were conveyed to Goldbelt, Inc. from the federal government under authority of the Alaska National Interest Lands Conservation Act (ANILCA). Subsequent land trades reduced the acreage of the Goldbelt, Inc. Echo Cove land holdings to approximately 1,400 acres. In 1982, a USDA Forest Service Environmental Assessment (EA) for a proposed Cowee-Davies Timber Sale Project selected a road access route to the Sawmill Creek drainage that was aligned through Goldbelt, Inc. land. Although the timber sale project was never implemented, the Forest Service and Goldbelt, Inc. signed a land exchange agreement in 1984, which resulted in title to the proposed road alignment passing to the Forest Service.

The 100 foot wide road alignment was determined in the Forest Service EA to be the most feasible route through the area. In 1994, the Alaska Department of Transportation and Public Facilities (ADOT&PF) began an EIS to consider alternative access to Juneau. The Juneau Access Improvements Draft EIS considers a number of alternatives that may result in a road along Echo Cove from the terminus of North Glacier Highway, parallel to the existing alignment on National Forest System land.

FIGURE 1-1-LOCATION MAP

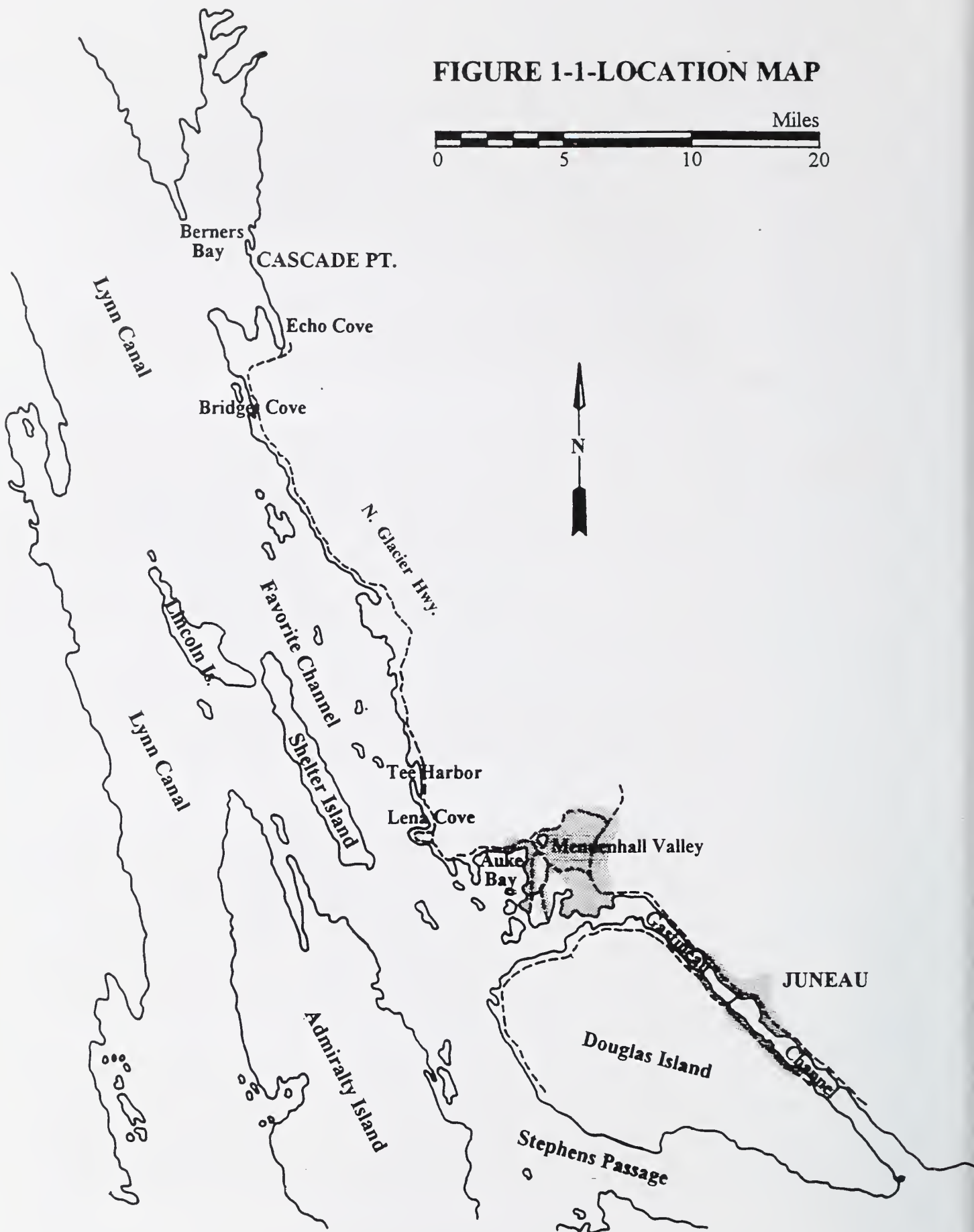
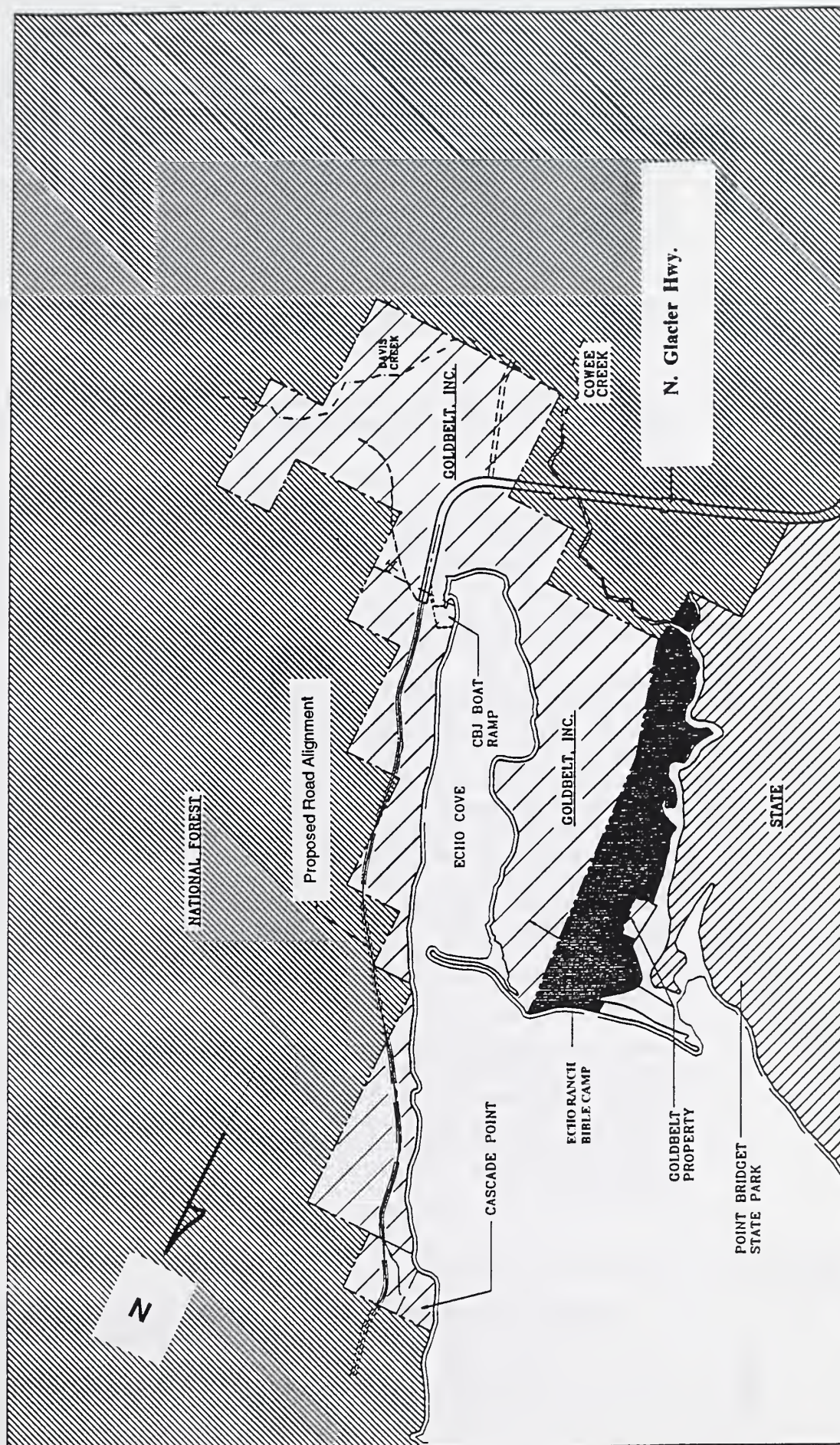


FIGURE 1-2 - ECHO COVE LAND OWNERSHIP



GOLDBELT CORPORATION

MINCH RITTER VOELCKERS ARCHITECTS

ECHO COVE MASTER PLAN

PROPERTY INVENTORY

8/86

In 1995, recognizing the need to eliminate the possibility of parallel routes through the area, Goldbelt, Inc., the Forest Service, and ADOT&PF signed an agreement recognizing one road alignment through the area. The agreed-upon alignment would roughly follow the existing road alignment on National Forest System land. Goldbelt, Inc. and the ADOT&PF further agreed that should the ADOT&PF need further widening for future road construction, Goldbelt, Inc. would allow widening of the right-of-way onto their private land to a width of 200 feet.

Purpose and Need

The purpose of the Proposed Action is to provide Goldbelt, Inc. access across National Forest System land to their private land.

Proposed Action

The USDA Forest Service proposes to grant a road easement for construction, operation, and maintenance of a road on National Forest System land near Juneau, Alaska.

The road would extend from the existing northern terminus of North Glacier Highway for a distance of approximately 2.5 miles to Cascade Point (Figure 1-3, Proposed Access Road Route). The access road would be 26 feet wide with a gravel surface and would be vertically designed to accommodate 35 mile per hour traffic and horizontally designed for 50 mph traffic. The access road would have an approximate cleared width of 70 to 100 feet, depending upon terrain (Figure 1-4, Proposed Echo Cove Road Extension Typical Section).

Construction of the access road is expected to begin immediately upon receipt of all necessary permits and easements. As stated in the Echo Cove Master Plan (MRV, 1996), Phase One of the development at Cascade Point would be the initial dock development including a log transfer facility which would proceed concurrently with road construction. Development of other facilities at Cascade Point would proceed as dictated by market conditions and acquiring needed permits, but is anticipated to begin soon after construction of the access road. Planned public facilities, as discussed in the Echo Cove Master Plan second phase of proposed development, consist of a lodge, high speed ferry facility, commercial fishery support, small grocery store, service station, maintenance garage, and small utilities building. The road would be closed to public vehicular travel during construction and until any one of the planned public facilities were constructed on private land at Cascade Point. Pedestrian access would be allowed on the proposed road before public facilities were constructed.

A concurrent regulatory action by the U. S. Army Corps of Engineers (USACOE), would be the consideration of a Department of the Army permit application for the discharge of dredged and/or fill material in wetlands and other waters of the United States, and the construction of structures and work in navigable waters. The USACOE regulatory authority would include the construction of the access road as well as the construction of a staging area and equipment and log transfer bulkhead at Cascade Point.

Decisions to be Made

The decisions to be made are:

- Whether to grant a road easement as proposed, or choose an alternative to the Proposed Action. The choice of alternatives includes a No Action

FIGURE 1-3 - PROPOSED ACCESS ROAD

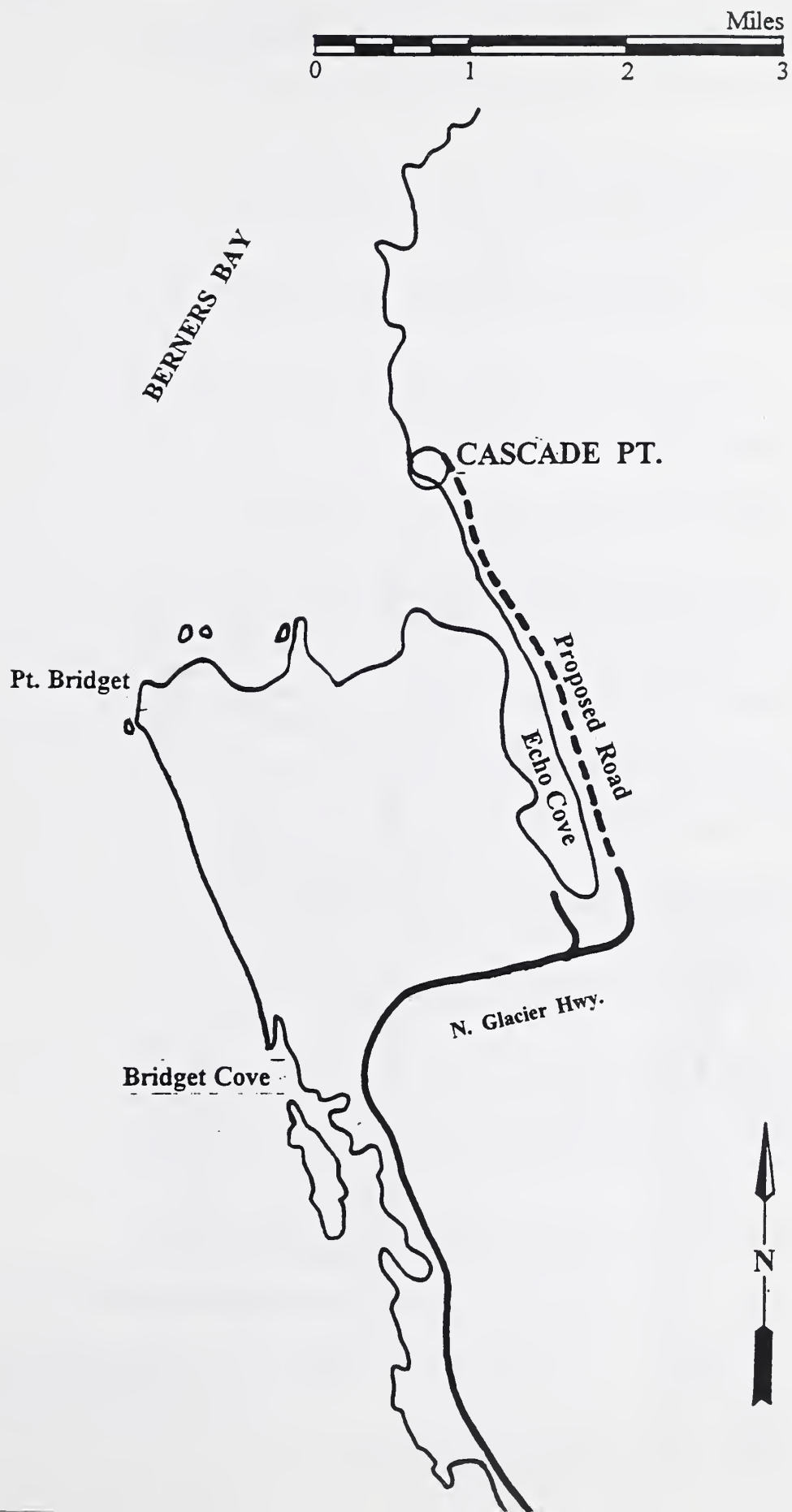


FIGURE 1-4 - PROPOSED ACCESS ROAD TYPICAL SECTION

USKH Architecture • Engineering Land Surveying • Planning Project:	Project Mgr.	DLM
	Drawn	CMB
	Checked	DLM
	Date: OCT 1996	USKH WO# 4965900

Sheet Contents:

Sheet No.:

OF

Alternative. The easement would allow construction, operation, and maintenance of a road on National Forest System land. This decision will be made by the Chatham Area Forest Supervisor, Tongass National Forest.

The Chatham Area Forest Supervisor will also determine any mitigation measures that would be required.

- The USACOE will determine whether or not to issue permits for the discharge of dredged and/or fill material in wetlands and other waters of the United States and for the construction of structures and work in navigable waters. This decision will be made by the District Engineer, USACOE.

The USACOE may also require mitigation measures for avoidance, minimization or replacement of wetland functions.

Scoping

An initial scoping effort in January and February of 1996 consisted of:

- An agency coordination meeting with personnel from state and federal resource agencies.
- An informational newsletter/notice of scoping meeting mailed to over 200 individuals, organizations and agencies.
- An open house style scoping meeting held February 8, 1996. Advertisements for this meeting were run for four days in the Juneau Empire newspaper.

Seventy-one letters and three telephone calls were received in response to the meeting and request for comments.

A second scoping effort after the decision to prepare an EIS consisted of:

- Request for comments in a May, 1996 newsletter mailed to 265 individuals, organizations, and agencies.
- A June 27, 1996 Notice of Intent to prepare an EIS published in the Federal Register, that also requested scoping comments.
- A June 4, 1996 State of Alaska, Division of Governmental Coordination, request for comments from state agencies.

In response to the second scoping effort, four letters and two telephone calls were received from the public. Also in response to scoping, letters were received from the following resource agencies: The U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, Alaska Department of Fish and Game, Alaska Department of Environmental Conservation, and the Alaska Department of Natural Resources.

The City and Borough of Juneau (CBJ), Community Development Department commented by telephone on allowable noise levels.

Native coordination meetings were held on March 10, 1997 to discuss findings of an

archaeological survey and to solicit information and comments from the Native community concerning the proposed project site. Ten members of the Native community attended these meetings. Information received at these meetings was consistent with information received from previous interviews with Native elders conducted by consultants (Yarborough, 1996). No objections to the proposed developments were voiced.

In response to comments received on the Draft EIS, additional interviews of Juneau area Natives were conducted for any more information of the project area. This information has been included in the Final EIS.

The Notice of Availability for the Draft EIS for the Cascade Point Access Road was published in the *Federal Register* on December 19, 1997. More than 200 copies were distributed to the public. On January 15, 1998 an Open House Public Meeting was held at the Juneau Ranger District to answer questions on the Draft EIS. By the end of the comment period on February 9, 1998 more than 96 responses were received. Appendix A presents the comment letters and responses to each comment. The Final EIS was revised as appropriate, based on the comments received.

Significant Issues

The following significant issues were identified during scoping.

Issue 1: The proposed road and increased use of the area could result in impacts to recreational activities in the adjacent public land. Commentors expressed concern that recreational activities such as wildland experience (solitude), sport fishing, hunting, camping, hiking, and viewing scenery could be negatively impacted by noise, increased human activity, increased access, and/or change in viewshed.

Issue 2: The proposed road and increased use of the area could impact wildlife in the area. Specific comments were received concerning mountain goat wintering habitat, bald eagle nests, and brown and black bear habitat. Increased access to the Sawmill Creek vicinity was also cited as a cause of possible impact to bears, bear viewing opportunities, and increased incidence of negative human/bear encounters.

Issue 3. The proposed road and increased use of the area could impact fisheries. Specific comments mentioned impacts to sport fishing opportunities in the Echo Cove and Berners Bay areas, and in streams and rivers draining into Echo Cove and Berners Bay as a result of degradation of water quality and fish habitat, and increased access.

Issues Not Used to Develop Alternatives

A number of comments on various issues were received during scoping that were determined to not meet the criteria for "significance" as defined by the National Environmental Policy Act (NEPA). These issues are discussed below.

Need for analysis in an Environmental Impact Statement.

Many commentors to the initial scoping action felt that an Environmental Impact Statement was necessary to adequately address the potential impacts of the proposal. The preparation of the Draft EIS was the outcome of those comments.

Cumulative effects throughout the Berners Bay area need to be addressed.

A number of commentors felt that all potential development actions in the Berners

Bay vicinity should be considered in this document. Specifically, commentors were concerned with the development proposed on Goldbelt, Inc. private land and the effects of that development on resources such as fish (including commercially valuable species such as Pacific herring), wildlife, bald eagles, recreation, sport fishing, scenery, and serenity. Although these issues are important, and are analyzed in this document, Chapter 4, Cumulative Effects, they are indirect impacts of the proposed access road, and may occur whether or not the proposed access road easement would be approved. As required by the National Environmental Policy Act, cumulative effects of reasonably foreseeable actions are considered in this document (CEQ, 1986).

Proposed Action would restrict existing access.

A number of commentors felt that the proposed road could decrease public access to Echo Cove and surrounding National Forest System land. The three significant issues discussed above address impacts from increased access. The issue of decreased public access was found to be "not significant" because current land ownership, and access to private and public lands would remain the same, or be improved by the Proposed Action. The proposed road would be constructed following a deeded strip of National Forest System land north of Echo Cove that the Forest Service obtained in a land exchange. Currently, pedestrian access along that National Forest System alignment, as well as on all adjacent National Forest System land, is unrestricted. Existing access to Goldbelt, Inc. land in the area is by permit only. Implementation of the Proposed Action would not change this.

Forest Service policy and private land access.

Comments were received during scoping addressing whether it is appropriate for the Forest Service to permit use of National Forest System land for the gain of a private landowner. Forest Service Manual (FSM) 2700 addresses Forest Service policy of granting access to private land through National Forest System land (see section on Existing Management Direction page 1-10) (USDA Forest Service, 1994).

**Existing
Management
Direction**

The Tongass Land and Resource Management Plan, Chapter 3, Management Prescriptions, provides the Forest Service with land management direction for the Tongass National Forest (USDA Forest Service, 1997).

The National Forest System land upon which the road would be constructed is assigned Land Use Designation "Scenic Viewshed". Scenic Viewshed lands are managed "...to provide a sustained yield of timber and a mix of resource activities while minimizing the visibility of developments as seen from Visual Priority Travel Routes and Use Areas" (USDA Forest Service, 1997). The Standards and Guidelines for "Scenic Viewshed" are included in Table 1-1. In addition, this management area contains both Proposed Power Transmission and Proposed State Road Corridors.

The land within the road corridor also has a Land Use Designation of Transportation and Utility System. The goal of this prescription is to provide for, and facilitate the development of, existing and future major public Transportation and Utility Systems, including those identified by the State of Alaska and the Alaska Energy Authority. The original designation of Scenic Viewshed applies until initiation of construction of a major system such as the road option under the Juneau Access Improvements.

The road corridor falls within the Tongass Land and Resource Management Plan Forest-wide standards and guidelines for Beach and Estuary Fringe. The beach fringe is an area of approximately 1,000 feet slope distance inland from mean high tide around marine coastline. Management is governed by the Scenic Viewshed Land Use Designation. Road construction is discouraged in beach and estuary fringes. Where feasible alternatives are not available, road corridors may be designated. Further guidelines state to provide or maintain recreation or community access where needed as identified through project analysis. Section 1323 (a) of ANILCA and 36 CFR 251.111 describe the need to provide access across National Forest System land to private land.

Forest Service Manual 2700 provides policies, authorities, and direction for granting rights-of-way for roads across National Forest System land. This policy states that the objectives of granting rights-of-way for roads are to:

Accommodate the access needs for the protection, development, and utilization of lands and resources owned by private interests or administered by public agencies when the planned Forest development road system and public road system do not meet those needs adequately, and to provide access across National Forest System land to private land that is adequate to secure the owners thereof of reasonable use and enjoyment of their land without unnecessarily reducing the management options of the Forest Service or damaging National Forest System lands or resources.

Forest Service policy also states that alternatives for access that do not use National Forest System land, and that have been used successfully for access to lands for similar purposes, must be considered (USDA Forest Service, 1994) and that the Forest Service will avoid regulation of private lands when considering and authorizing access to those private lands (USDA Forest Service, 1995).

Section 1323 (a) of ANILCA states "...the Secretary shall provide such access to nonfederally owned land within the boundaries of the National Forest System as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof..." *Adequate access* is defined in 36 CFR 251.111 as: "a route and method of access to non-federal land that provides for reasonable use and enjoyment of the non-federal land and that minimizes damage or disturbance to National Forest System lands and resources." 36 CFR 251.114 states that "the authorizing officer shall determine what constitutes reasonable use and enjoyment of lands..."

National Forest System land immediately to the northeast of Goldbelt, Inc. land at Cascade Point is assigned a Congressionally legislated LUD II prescription. This land is to be managed in a roadless state to retain its wildland character. This designation permits primitive and semi-primitive recreational activity, but excludes commercial timber harvest and roads except for specifically permitted uses. Under the Proposed Action no roads or facilities are proposed within the LUD II area.

The area immediately to the north of Cascade Point, including the mouth of Sawmill Creek, is designated for "Semi-Remote Recreation". This designation would provide for recreation and tourism in natural-appearing settings where opportunities for solitude and self-reliance are moderate to high.

Table 1-1

Recreation Opportunities Spectrum (USDA, 1997)

Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Modification Visual Quality Objective and typically is Partial Retention. Existing Visual Conditions ranging from Preservation through Retention are fully compatible and encouraged.
Access	All forms of access and travel modes may occur. Access to and through the area is typically by passenger vehicle, although motorized use may be restricted to provide for resource protection, user safety, or to provide a diversity of recreational opportunity.
Remoteness	Remoteness is of little importance, but low to moderate concentrations of human sights and sounds are preferred. Setting is located within .5 mile (greater or less depending on terrain and vegetation but no less than .25 mile) of moderate to heavily-traveled waterways and/or roads which are maintained to Levels 3, 4, and 5 and open for use by the public or those areas that receive heavy small aircraft travel.
Visitor Management	On-site regimentation and controls are obvious. Control facilities such as parking areas, barriers and signs harmonize with the natural environment. Visitor information facilities are not elaborate or complex.
On-site Recreation Development	Facilities and structure generally do not exceed Development Scale III and are maintained to accommodate the types and levels of use anticipated for the site and area. Typical facilities include outdoor interpretive displays and rustic campgrounds and picnic areas.
Social Encounters	User meets less than 20 other parties per day at least 80% of the primary use season. User may meet numerous other parties on roads and developed recreation sites. Developed sites often are at full capacity but do not exceed 80% of the design capacity over the season of operation.
Visitor Impacts	Visitor-caused impacts are noticeable, but not degrading to basic resource elements nor do they exceed established Visual Quality Objectives. Site hardening may be dominant, but is in harmony with natural-appearing landscape and appropriate for the site and setting.

**Area
Planning and
Management
(Goldbelt,
Inc.)**

In order to meet the CBJ requirements, Goldbelt, Inc. has prepared a master plan for their private land at Echo Cove (MRV, 1996). The entire Echo Cove parcel has been designated as a New Growth Area in the CBJ Comprehensive Plan (CBJ, 1996), meaning that eventual development of a scale and density to create a small self-contained community is anticipated. The Master Plan allows Goldbelt, Inc. to evaluate their opportunities and assures orderly and reasonable development of the land. The purpose of the Master Plan is to evaluate the feasibility of development in

New Growth Areas, taking into account a number of considerations including physical amenities, physical suitability, potential natural resource conflicts, size/configuration, and ownership patterns (CBJ, 1996).

The Master Plan identifies development on approximately 10% of the Goldbelt, Inc. 1,400 acres at Echo Cove. Planning includes a 40 acre commercial development site at Cascade Point, an 80 acre Cultural Center in Echo Cove, a camping area adjacent to the CBJ boat launch ramp in Echo Cove, and a future lodge development site at Echo Rock, just north of the mouth of Echo Cove. The Master Plan identifies land inside Echo Cove for low impact recreational and cultural development.

The proposed access road and initial dock development including log transfer at Cascade Point are envisioned as Phase One of the Master Plan. Planned public facilities, as discussed in the Echo Cove Master Plan second phase of proposed development, consist of a lodge, high speed ferry facility, commercial fishery support, small grocery store, service station, maintenance garage, and small utilities building.

Cascade Point has been identified for this proposed development because of the gently sloping uplands, potable water source, and deep water dock potential outside of Echo Cove.

U.S. Army Corps of Engineers

The USCOE is a cooperating agency in preparation of this Final EIS. The access road would require authorization by the USCOE under Section 404 of the Clean Water Act, which regulates the discharge of dredged and/or fill material into waters of the United States, including wetlands. Construction of the proposed log and equipment transfer facility on Goldbelt, Inc. land at Cascade Point would require authorization under Section 10 of the Rivers and Harbors Act of 1899, which regulates the construction of structures and/or work in navigable waters of the United States. The policy for administration of Section 404 of the Clean Water Act includes the Section 404 (b)(1) guidelines, which require avoidance and minimization of discharges into waters of the United States, including wetlands and other special aquatic sites, where less environmentally damaging practicable alternatives exist. Costs, logistics, and existing technology are factors which are considered when evaluating project alternatives. If a discharge is unavoidable, minimization is required. Mitigation for project impacts may also be required where appropriate and practicable.

Other Laws and Permits

City and Borough of Juneau: The CBJ has zoning and planning authority over private lands in the area, including Goldbelt, Inc. private land. The area is zoned as a New Growth Area, requiring approval of a master plan for all major developments. "The purpose of the New Growth Area classification is to provide for flexibility in land use controls for a specific new growth area as designated in the Comprehensive Plan, while protecting the public health, safety, and welfare by ensuring that the development will be consistent with the Comprehensive Plan and the carrying capacity of the land." (CBJ, 1996). The proposed initial development is consistent with current CBJ zoning for the area.

U.S. Fish and Wildlife Service: USF&WS administers the Endangered Species Act, as re-authorized in 1982, and the Eagle Protection Act of 1940, as Amended. The Forest Service must consult with the USF&WS regarding any threatened or

endangered species that might be impacted by the proposed action or alternatives. If any impacts are projected, measures to protect the species must be developed. In addition, possible impacts to bald eagles or bald eagle nests must be coordinated with the USF&WS.

National Marine Fisheries Service: For the proposed development at Cascade Point, the Corps of Engineers must consult with the NMFS in accordance with the Endangered Species Act, the Marine Mammal Protection Act, and the Research and Sanctuaries Act before issuing their permits.

Environmental Protection Agency: EPA administers a general permit for Storm Water Discharge that applies to construction projects with over five acres of disturbed soil. A conceptual storm water, erosion and pollution control plan is included in the Planning Record (Easton Environmental, 1996) and will be submitted to EPA prior to road construction.

Alaska Department of Environmental Conservation: ADEC administers Section 401 of the Clean Water Act through issuance of a 401 Water Quality Certification as part of the Corps of Engineers permit process. This certification assures compliance with state water quality standards during construction and operation of facilities requiring USCOE permits.

Alaska Department of Fish and Game: ADF&G provides comments and recommendations to federal agencies in accordance with the Fish and Wildlife Coordination Act (ADF&G, 1965).

Alaska Department of Natural Resources, Office of History and Archaeology: This division of the ADNRR administers the National Historic Preservation Act. The State Historic Preservation Officer is responsible for issuance of a clearance before any project that could disturb cultural resources can proceed.

Alaska Department of Natural Resources, Division of Lands: This division of the ADNRR is responsible for State Tidelands Leases, necessary for construction of the proposed log and equipment transfer bulkhead and reasonably foreseeable dock facility at Cascade Point. This lease is not necessary for the proposed access road.

State of Alaska, Division of Governmental Coordination: DGC coordinates all State of Alaska agency comments and permits and issues a Determination of Consistency with the Alaska Coastal Zone Management Plan. Agencies such as ADEC, ADF&G, and ADNRR comment on consistency with applicable state laws and regulations.



Chapter 2

Alternatives



Alternatives, Including the Proposed Action

Introduction

The National Environmental Policy Act (NEPA) mandates consideration of alternatives to the Proposed Action (including the No Action Alternative) that address significant issues. Those issues have been identified through the public and agency scoping process, described in Chapter 1, Scoping. This chapter describes and compares reasonable alternatives, as well as explaining the rationale for the alternatives eliminated from detailed study (40 CFR 1502.14). Please see Table 2-1 for comparison of alternatives by component, and Table 2-2 for comparison of alternatives by issue.

Alternative A - No Action

Under the No Action Alternative the Forest Service would not issue the road easement special use permit for construction of an access road to Cascade Point, and the US Army Corps of Engineers (USACOE) would not issue required authorization under Section 404 of the Clean Water Act for construction of the access road.

Alternative B - Proposed Action

Under this alternative, the Forest Service road easement special use permit would be issued to Goldbelt, Inc. for construction, operation, and maintenance of the access road on National Forest System land to Cascade Point.

The access road would consist of a 26 foot wide gravel-surfaced road, with clearing limits from 70 to 100 feet wide, from the terminus of North Glacier Highway for a distance of approximately 13,400 feet (2.5 miles). The Forest Service road easement would be issued to include the entire cleared area necessary for the road. Rock needed for the road construction would come from the excavation on the road alignment and Goldbelt, Inc. private land. Construction of the access road would require approximately six weeks. Upon completion of the road, an "as-built" survey would be performed to describe the road. The road would depart from the National Forest System land and be constructed on Goldbelt, Inc. land for another 2,400 feet (one-half mile) to the proposed development site at Cascade Point. The proposed activity at Cascade Point is described in Chapter 1, Area Planning and Management (Goldbelt, Inc.).

Construction of the access road is expected to begin immediately upon receipt of all necessary permits and easements. As stated in the Echo Cove Master Plan (MRV, 1996), Phase One of the development at Cascade Point would be the initial dock development including a log transfer facility which would proceed concurrently with road construction. Development of other facilities at Cascade Point would proceed as dictated by market conditions and acquiring needed permits, but is anticipated to begin soon after construction of the access road. Planned public facilities, as discussed in the Echo Cove Master Plan second phase of proposed development, consist of a lodge, high speed ferry facility, commercial fishery support, small grocery store, service station, maintenance garage, and small utilities building. The road would be closed to public vehicular travel during construction and until any one of the planned public facilities were constructed on private land at Cascade Point after safety concerns related to the road construction equipment and activity are

eliminated. Pedestrian access would be allowed on the proposed road before public facilities were constructed.

**Alternative C
- Access
Road With no
Public
Access**

This alternative would be physically similar to the Proposed Action, with the exception that permanent gates with gate-keepers would be placed at the beginning of the access road, and at the point where the access road enters Goldbelt, Inc. private land (approximately 0.5 miles from Cascade Point). The use of the access road would be restricted to traffic traveling to and from Goldbelt, Inc. private land for the use of those facilities. Pedestrian access would be allowed on the access road. This alternative would address the three significant issues discussed in Chapter 1. Impacts to recreational opportunities on public lands would be decreased by limiting public access to pedestrian travel. In addition, impacts to wildlife and fisheries would be addressed by limiting the possibilities of vehicular conflicts with wildlife, as well as by limiting the possibilities for degradation of water quality on National Forest System land by those using vehicular access.

**Alternatives
Eliminated
from Detailed
Study**

The following alternate access routes, requiring little or no National Forest System land, are not described as separate alternatives. The No Action Alternative assumes that water access and access using no National Forest System land would be available to Goldbelt, Inc. if the road easement permit were not approved. The route close to the beach using less National Forest System land has similar environmental consequences as the route using no National Forest System land.

Water Access: Goldbelt, Inc. currently has water access to their private property and would continue to have water access regardless of the alternative selected. Any water access improvements such as a dock facility would be dependent on USCOE permitting and an approval of a marine facility.

Access Road Close to the Beach: A road built close to the beach would follow an alignment along the top of the first bench, parallel to and uphill of the Echo Cove shoreline at an elevation of approximately 100 feet and 100 to 200 feet inland of the shoreline. An alignment at this elevation would use less National Forest System land and wetlands than the proposed alignment but would use more Goldbelt, Inc. land. This alternative was eliminated from detailed study since it would not address any significant issues and would result in substantially greater environmental impacts than the location of the Proposed Action alignment.

Construction of a road using Goldbelt, Inc. private land and less National Forest System land than the Proposed Action would require fill in wetlands. A USCOE authorization under the Clean Water Act would still be required. While this alignment may be feasible from a construction standpoint, a number of environmental factors on that alignment would make construction there environmentally unacceptable. Storm water control would be very costly and possibly not effective so near to the water. The route would necessitate crossing a number of steep and wide ravines. The route would be inconsistent with the Alaska Coastal Management Plan, which requires transportation facilities to be sited inland unless no prudent and feasible alternatives exist. In addition, the route would pass within 330 feet of three bald eagle nests on Goldbelt, Inc. land. From a logistics standpoint, construction of such a route would create the potential for parallel highways through the corridor, with the Forest Service retaining ownership of the proposed alignment uphill.

Access Road Using no National Forest System Land: The only way to eliminate use of National Forest System land when building a road would be to build the road entirely on Goldbelt, Inc. private land near the beach with a portion of the road crossing state tidelands. Crossing state tidelands with a road would require fill within the tidelands. This alternative would not address any significant issues and would result in substantially greater environmental impacts than the location of the Proposed Action alignment. This access would be available for Goldbelt, Inc. to pursue if the No Action Alternative were selected.

Construction of a road on Goldbelt, Inc. land and state tidelands near the shoreline of Echo Cove would have the same environmental consequences as an access road close to the beach using less National Forest land. Additional environmental consequences would occur from a road on Goldbelt, Inc. private land and state tidelands. This route would use more estuarine, or intertidal wetlands. Tideland fill would result in short-term sedimentation of the water and long-term loss of productivity on the filled area of the beach, including clams and other intertidal creatures.

If the road were constructed on Goldbelt, Inc. land and state tidelands, there would be a 500 foot stretch of road below tideline near the mouth of Echo Cove. This option would have visual and noise impacts, as well as the loss of several acres of public beach. This option would move vehicular traffic onto the beach, where it would both be seen and heard by people who recreate on the water and the beach in Echo Cove.

Mitigation

Mitigation measures are those activities or commitments necessary to avoid or lessen adverse environmental impacts of the action alternatives. Mitigation measures presented here apply to the proposed access road, under all action alternatives.

WILDLIFE

- Elimination of clover from hydro-seed mixes. Sweet smelling clover blossoms attract bears - this measure removes that attraction.

FISHERIES

- Use of erosion and sediment controls listed below under Water Quality to minimize impact to water quality in small drainages, including the receiving waters of Echo Cove and Bemers Bay.

WETLANDS

- Discharges of dredged or fill material into wetlands and other waters of the United States would be avoided to the extent practicable and feasible. For remaining unavoidable impacts, fill would be minimized.
- Minimization of impacts by using "Best Management Practices" such as operation of heavy equipment only on already filled areas (end-dump), hand clearing of vegetation in wetlands not intended to be filled, and use of only non-toxic fill materials and maintaining wetland hydrology by minimizing cutting and ditching on gently sloping terrain. Wetland trees and shrubs in the cleared area would be removed for visibility and safety reasons.

WATER QUALITY

- Minimizing soil disturbance by limiting clearing limits to the areas necessary for safe operation, as well as preserving natural ground cover and root wads beyond grubbing limits.
- Use of fill and cut slopes that are commensurate with soil stability to avoid slope failures.
- Control placement of fill near stream channels.
- Use of vegetative buffer strips to naturally control sediment in runoff.
- Mulching and hydro seeding of waste sites, roadway ditches and embankments, and other disturbed areas.
- Structural erosion and sedimentation controls such as ditch blocks to control water velocities.
- Careful selection of temporary and permanent fuel storage sites. Such sites would be located away from waterways, streams, and wetlands.
- Diversion structures to channel runoff around and fuel storage sites, waste material disposal sites and sensitive fill or cut slopes.
- Rock protection at culvert outlets to prevent bed erosion.
- Structural measures to prevent runoff from reaching streams during construction in stream valleys and ravines. These measures may include silt fences, check dams, sediment basins, and other measures as appropriate. Some measures may be incorporated into final designs as permanent storm water control measures.
- Best management practices for water quality would be used, including measures described above, as well as monitoring of water quality after storm events.

VISUAL

The following measures would be used along the proposed access road to assure compliance with the Scenic Viewshed land use designation of the area:

- Roadside cleanup of construction activities, including removal of brush and slash.
- Cutting stumps as low as possible, and angled away from the viewer.
- Cutting the roadside clearing limits in an undulating pattern, to simulate a natural clearing edge.
- Use of native species of plants to re-vegetate exposed cut and fill slopes.

Table 2-1

Comparison of Alternatives by Component

Component	Alternative A No Action	Alternative B Proposed Action	Alternative C
Access Road (Forest Service Decision)	None on National Forest System land, possible road on Goldbelt, Inc. land / State of Alaska tidelands, or marine access.	On Forest Service alignment	Same as Alternative B.
Development at Cascade Point (Non-Forest Service Decision)	Ranges from no development to same as Alternative B.	Phase 1: access road, initial dock development including log transfer facility, Phase 2: lodge, high speed ferry, fisheries support, grocery, service station, garage and utility building.	Same as Alternative B.
Access to National Forest System Lands (Forest Service Decision)	Same as existing access.	Pedestrian access on road, public vehicular access when any one of the planned public facilities at Cascade Point is completed.	Pedestrian access on road, no public vehicular access.

Table 2-2

Comparison of Alternatives by Issue

Issue	Alternative A No Action/No Development	Alternative A No Action/ Development	Alternative B Proposed Action/No Development	Alternative B Proposed Action with Development	Alternative C Gated Road with Development
Impacts to Wildlife	None	22% reduction of modeled brown bear carrying capacity, 13% reduction of modeled marten carrying capacity, less than 2% reduction of modeled black bear carrying capacity, less than 1% reduction of mountain goat carrying capacity (if lodge constructed)	1% reduction of modeled brown bear carrying capacity, 10% reduction of modeled marten carrying capacity, 4% reduction of modeled black bear carrying capacity, less than 1% reduction of modeled mountain goat carrying capacity	23% reduction of modeled brown bear carrying capacity, 23% reduction of modeled marten carrying capacity, less than 6% reduction of modeled black bear carrying capacity, less than 1% reduction of mountain goat carrying capacity (if lodge constructed)	The impacts to wildlife from this alternative are assumed to be marginally <u>less</u> than Alternative B, because one factor used in computation of reduction in habitat carrying capacity is based on vehicular traffic access, which would be somewhat <u>less</u> with this alternative.
Impacts to Fish	None	Impact to saltwater species along Echo Cove shoreline and Cascade Point	None	Impact to saltwater species at Cascade Point only	Impact to saltwater species at Cascade Point only
Impacts to Recreat- ional Activi- ties	None	No change from existing on National Forest System land. May lead to increased use of Sawmill Creek area; increased noise and visual impact along road corridor.	Consistent with Forest Service Visual Quality Objectives, may lead to increased use of Sawmill Creek area; increased noise and visual impact along road corridor.	Consistent with Forest Service Visual Quality Objectives, may lead to increased use of Sawmill Creek area; increased noise and visual impact along road corridor.	Restricts public vehicular traffic on access road. May lead to less increased use of Sawmill Creek area than Proposed Action.

Chapter 3

Affected Environment



Affected Environment

Introduction

This chapter gives a description of the environment within and surrounding the Echo Cove to Cascade Point study area. The information in this chapter was gathered from a variety of sources, including published data by several resource agencies, other Draft and Final Environmental Impact Statements, studies commissioned for this Environmental Impact Statement, and interviews with Tlingit elders. Resource reports used to compile this data are contained in the Planning Record on file at the Juneau Ranger District Office.

The study area is comprised of a strip of land beginning near the head of Echo Cove, at the end of North Glacier Highway, and extending northerly approximately three miles to the point in Bemers Bay shown on nautical charts as "Cascade". The focus of this environmental document is a 100 ft. wide strip of National Forest System land that parallels the shoreline approximately one-fourth of a mile inland. The proposed road alignment crosses both National Forest System land and Goldbelt, Inc. land, and generally follows a bench at an elevation of approximately 200 feet above sea level.

The area is comprised of a relatively homogeneous physical terrain, with a moderate to steep slope up from tidewater to the proposed road alignment, and mountainous terrain up slope of the alignment. The Cascade Point area is the only relatively flat land in Goldbelt, Inc. ownership that is outside of Echo Cove. Vegetation is characterized by a mature spruce/hemlock forest with forested wetlands on poorer drained soils. A number of small, clear and steep streams cross the alignment.

The tidelands and near-shore forests are used extensively by Goldbelt, Inc. shareholders and their families for many recreational and subsistence activities, while the public uses the tidelands and the City and Borough of Juneau (CBJ) boat launch area and primitive campground at the head of Echo Cove for recreation activities. Access to Goldbelt, Inc. land is by permit from Goldbelt, Inc. only.

Soils and Wetland

Soils data for the study area was gathered in the course of wetland delineations. Soil pits were dug at random intervals along the proposed access road alignment, as well as at the proposed development site at Cascade Point. The wetland work showed four types of soils in the study area, ranging from well drained beach gravels to saturated organic muck (Dunn Environmental Services, 1997b).

The most prevalent soil is a reddish brown well-drained Kupreanof soil found in well-drained forest areas, typically containing a vigorous growth of spruce and hemlock trees.

The Maybeso histosol is the next most prevalent soil. It is a saturated organic muck two to three feet thick, typically found in forested wetlands

In transitional areas between the Kupreanof and Maybeso soils is a hydric grey silty Wadleigh soil. This soil varies from being saturated in the upper two feet to being non-saturated and is typically found on the borders of forested wetlands.

The least prevalent soil, beach gravel, is found on or near beaches but may exist in

some wetlands at the mouths of streams or seeps.. This soil is usually well-drained.

In addition to these soil types, rock outcrops are also found in the study area. Rock outcrops are especially numerous just up slope of the proposed road alignment and in a section of alignment approximately one-half to one mile south of Cascade Point as well as along the shore. The rock along the alignment is most likely part of the Berners Formation, consisting of slate and graywacke, possibly including undifferentiated areas of metabasalt (US Geological Survey, 1911). The rock is typically covered by a thin organic mat, and all but vertical faces or areas exposed to salt spray are typically forested.

Wetlands in the study area were delineated to the specifications of the *Corps of Engineers Wetland Delineation Manual, 1987*. The focus of delineations was along the proposed access road alignment and in the proposed Cascade Point development site. The National Wetlands Inventory (NWI) prepared by the US Fish and Wildlife Service was consulted. Boundaries of wetlands encountered along the proposed road alignment were followed up and down hill to estimate their extent, and to determine if reasonable avoidance routes existed (Figure 3-1, Wetlands).

All wetlands encountered up slope of beaches are either forested or riverine wetlands. A wetland characterized by shrubs and emergent vegetation is found on the upper beach near Cascade Point.

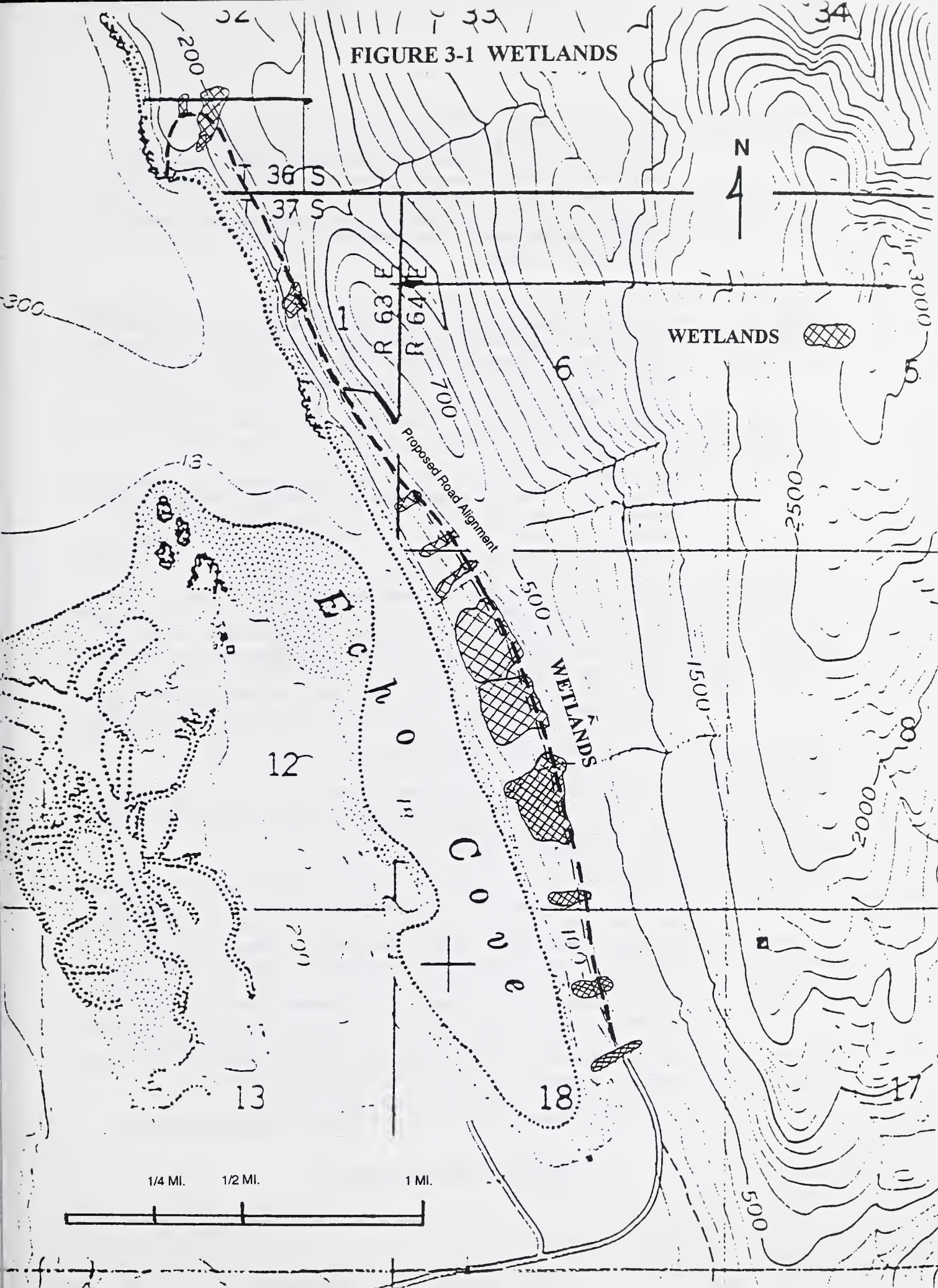
Forested wetlands typically have dominant vegetation of Sitka spruce and western hemlock in the tree stratum, devil's club, blueberry, and rusty Menziesia in the shrub stratum, and Canada bunch berry, five-leaf bramble, skunk cabbage, and fernleaf goldthread in the forb (broad-leaf herb) stratum. Soils were typically organic, saturated to the surface, with occasional pools of standing water.

The wetland on the beach at Cascade Point has a dominant shrub stratum of Sitka alder, with a forb stratum dominated by silverweed, Alaska plantain, spike rush, and lupine. Soil is beach gravel saturated to the surface from a small seep. Lower emergent portions of this small wetland are inundated by tides over 16 feet.

Forested wetlands tend to be uniformly wide from the steep slopes above the proposed road alignment to just above the last bench or beach cliff, and then become narrow near the beach cliffs to form drainage channels in steep ravines. Streams and small drainages encountered along the proposed road alignment typically have narrow riparian (adjacent the stream) wetlands in the bottom of incised ravines.

A rapid functional analysis using the Wetland Evaluation Technique, as modified by Adamus (Adamus Resource Assessment, 1988), was performed for wetlands within the study area. This functional analysis examines twelve common functions of wetlands by comparing physical characteristics of the wetland to criteria established by the Adamus Resource Assessment study. The functions are then rated from low to high. The forested wetland functional analysis showed high ratings for the functions of "disturbance of sensitive wildlife" and "ecological replacement cost". The scrub shrub/emergent wetland functional analysis showed high ratings for the functions of "ground water discharge" and "regional ecological diversity" (Dunn

FIGURE 3-1 WETLANDS



Environmental Services, 1997b).

The high rating for "disturbance sensitive wildlife" is attributable to proximity to National Forest System land, as well as known mountain goat wintering habitat. The high rating for "ecological replacement cost" is a function of the long period of time necessary to create a forested wetland. The high rating of the beach wetland for "regional ecological diversity" is a function of the wetland being on the border of fresh and salt water environments.

Water

The proposed access road alignment would cross five small intermittent streams and one permanent stream with less than one cubic foot per second (cfs) flow rates on National Forest System land. These small drainages are typically contained in small ravines and have 5% to 20% grades. The five intermittent streams are one to two feet wide, while the one permanent stream on National Forest System land is approximately five feet wide and four inches deep. In addition, the access road would cross Cascade Creek on Goldbelt, Inc. private land, discussed below.

No resident or anadromous fish were observed in any streams in the project area. A study done for the Juneau Access Improvements Draft EIS in 1994 looked at every drainage in the study area and found no anadromous fish streams (FPE Roen Engineers, Inc., 1994). This is confirmed by the *Alaska Department of Fish and Game Fish Habitat Atlas*.

Cascade Creek, near the proposed development site, would be crossed by the portion of the proposed access road entirely on private Goldbelt, Inc. land, and is also proposed as the source of drinking water for development at Cascade Point. Cascade Creek is a small stream flowing generally westerly to Berners Bay tidewater approximately one-quarter mile south of Cascade Point. The creek's watershed extends inland approximately one and one-half miles, and the upper portions of the watershed include alpine areas of an unnamed peak to the east with an elevation of approximately 3,100 feet. Lower portions of the watershed are forested in the Sitka spruce and western hemlock association typical of Southeast Alaska.

The watershed area of Cascade Creek is 1.7 square miles. Two main branches converge at a point one-quarter mile inland at an elevation of a little less than 400 feet. There is no appreciable storage afforded by lakes or ponds on either branch (Easton Environmental, 1996).

No resident fish were observed in the area of the proposed Cascade Creek crossing or in the area of the proposed water intake during several visits in the spring and summer of 1996. However, given that the size and configuration of the creek is very similar to other streams in Southeast Alaska that do contain resident fish, it is assumed that small resident populations of Dolly Varden char and cutthroat trout do inhabit the stream. Both the proposed road crossing and the intake areas are in high gradient stretches of the stream, with a 15 foot waterfall above the proposed crossing, and a 40 foot waterfall below. The waterfall below the proposed crossing is a barrier to anadromous fish. The approximately 100 feet of stream downstream of the waterfall to tidewater is dominated by large cobbles and bedrock substrate and does not contain quality spawning or rearing habitat for anadromous fish.

Cascade Creek is expected to have a mean annual flow of 5.5 cfs, with a mean

annual flood of 280 cfs, a 10-year flood of approximately 470 cfs, and a winter seven-day, 10-year low flow of approximately 0.6 cfs. These flows are sufficient to provide potable water for planned developments at Cascade Point.

A water sample was drawn from Cascade Creek on August 29, 1995, and analyzed for inorganic constituents regulated under state regulations. All concentrations were well below regulatory maximum contaminant levels with the exception of color units.

Vegetation

The study area is a part of the Southeast Alaska coastal rainforest. The dominant vegetation type in the study area is the Coastal Spruce - Hemlock Forest (Vioreck and Little, 1972). Dominant plant species are noted above in the wetland section. In general, most species listed except skunk cabbage, an obligate wetland plant, were dominant in both wetlands and non-wetlands.

A sensitive plant species survey was undertaken in conjunction with the wetland investigations. This survey focused on seven species of plants suspected to occur in the project area, of the 22 species that are designated as sensitive in the Alaska Region (Dunn Environmental Services, 1996b). No sensitive plants were located in areas likely to be affected by project activities.

Wildlife

Large mammals known to inhabit the project area include: brown bear, black bear, Sitka blacktail deer, mountain goat, and moose. Other animals include marten, mink, river otter, red squirrels, voles, shrews, and numerous species of small perching song birds and several raptors, including the bald eagle. Common mergansers, harlequin ducks, Barrows golden eyes, and buffleheads may nest in the vicinity. In addition, a number of sea birds and ducks use Bemers Bay for resting and feeding, including: common, arctic, and yellow-billed loons; white-winged, surf, and common scoters; grebes, seagulls, murres, and murrelets (US Fish and Wildlife Service, 1996).

Four management indicator species (MIS): brown bear, black bear, mountain goat, and marten were chosen to collectively represent the complex of habitats, species, and associated management concerns in the project area (Dames and Moore, 1997). Projections of changes to identified habitats of management indicator species are used to assess the results of decisions relating to the management of Tongass National Forest lands. Habitats of these management indicator species have been mapped based on habitat capability models jointly developed by the Forest Service and ADF&G biologists. These models represent the current "state-of-the-art" in our predictive modeling capabilities. Through the use of these models, loss of management indicator species habitat can be evaluated for disturbances such as timber removal or road construction and operation. These models also predict the number of animals potentially supported in an area based on habitat capability values computed for existing habitats. Population estimates derived from the models should not be construed as actual estimates of existing populations, but can be used to compare the relative magnitude of impacts among development alternatives.

Wildlife information was gathered from the following sources; a wildlife report done for the Juneau Access Improvements project (Dames and Moore, 1997), an Alaska Department of Fish and Game study on mountain goat wintering (Fox, 1979), and information supplied by the US Fish and Wildlife Service.

Habitat models developed by the Forest Service and ADF&G indicate that the habitat along the proposed road corridor is low quality winter habitat. The ADF&G mountain goat study (Fox, 1979) found mountain goats wintering on and near the proposed road location where it would traverse a rocky outcrop about one mile south of Cascade Point. No mountain goat pellets, hair, or browse areas were found during field investigations related to this project. This information indicates that even though the habitat along the proposed road corridor is not considered high quality winter habitat, it is used by mountain goats during some winters. During the winter the Fox study was conducted, the Juneau area received slightly less than average snow fall. This indicates that the mountain goats use lower elevations even though they were not pushed down to the lowest elevations by heavy snows.

It is not uncommon for mountain goats to use low elevation habitats during late winter and early spring, regardless of the severity of snow depths. They may be responding to environmental factors not detectable by humans such as predator densities, mountain goat densities, and weather variables other than snow depth.

The entire study area lies within the Alaska Department of Fish and Game Wildlife Analysis Area 2514, an area of 24,201 acres (Figure 3-2, Wildlife Analysis Area). Analysis of this area, and application of habitat suitability index ratings to the area show the following assumed capacity for the management indicator species.

- brown bear - 14
- black bear - 54
- mountain goat - 78
- marten - 45

These numbers do not represent actual numbers of animals, but rather the assumed capacity of the habitat within the wildlife analysis area for each species. These numbers are used to model assumed losses in habitat to compare alternatives in Chapter 4, Environmental Consequences.

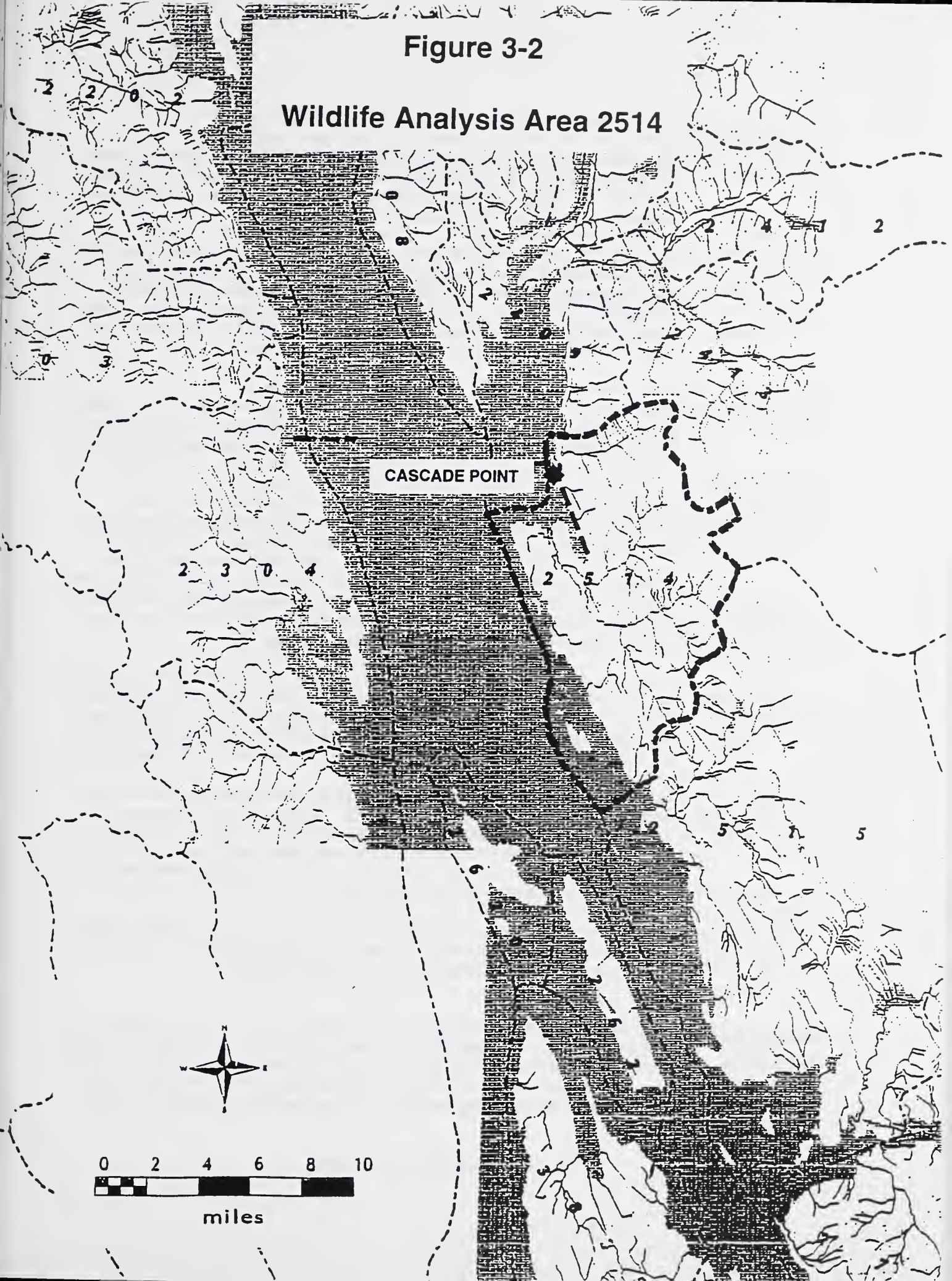
The mouth of Sawmill Creek, approximately one mile north of Cascade Point, is considered by some as a good place to view brown and black bears.

Three bald eagle nests are known in the project area, with two more just beyond the boundaries of the area, and a total of 43 in the Berners Bay vicinity. One nest, shown as #65 on US Fish and Wildlife maps, is located close to the proposed Cascade Point development site. The private access road proposed would pass 100 feet from this nest tree. The vegetation surrounding the tree at this site is a mixture of small and large trees, and is judged to be windfast. This nest has not been used for at least three seasons as evidenced by a red elder bush growing in the nest, first spotted in the spring of 1995. One nest along Echo Cove has been active in 1995 and 1996.

Bald eagles and their nests are protected by the federal Eagle Protection Act as well as by a Memorandum of Agreement between the Forest Service and the US Fish and

Figure 3-2

Wildlife Analysis Area 2514



Wildlife Service.

Bald eagle nests were located using helicopter mounted Global Positioning System (GPS) for the Juneau Access Improvements Draft EIS. Nests were then located in the field and locations of nests verified. Two of five nests thought to be within the study area were found to have fallen down.

No threatened or endangered species are known to inhabit the upland portion of the study area, although three species, American peregrine falcon (endangered), humpback whale (endangered), and Steller sea lion (threatened) are transient inhabitants within the region of the project area. However, no known critical habitat for any federally listed threatened or endangered species occurs within the project area.

Fish

Fish inventory information was gathered from several sources: US Fish and Wildlife comments, Alaska Department of Fish and Game Fish Habitat Atlas and comments on Pacific herring (MacGregor, 1996), and field investigations of drainages potentially affected by the proposed access road (Dunn Environmental Services, 1997a).

Fish species known to inhabit Berners Bay and associated drainages include: cutthroat trout; Dolly Varden char; pink, chum, silver, red, and king salmon; Pacific herring, eulachon, and various oceanic bottom fish, including Pacific halibut and rockfish. The ADF&G Fish Habitat Atlas contains no listings of anadromous fish streams that would be crossed by the proposed access road. Cascade Creek, which would be crossed by the proposed access road on Goldbelt, Inc. land is assumed to have resident populations of cutthroat trout and Dolly Varden, although none were observed in the immediate vicinity of proposed activities.

Pacific herring spawning was observed in the vicinity of Cascade Point in the spring of 1996 by ADF&G fisheries biologists flying a herring spawning survey (MacGregor, 1996). A site visit shortly thereafter at a minus tide showed herring spawn on kelp starting approximately 200 yards north of Cascade Point, and continuing to the north past Sawmill Creek. This observation was consistent with the ADF&G observation.

Kelp growing on rock near Cascade Point appeared to be the same species as that being used for spawning activities to the north, but did not contain any spawn, nor was there any spawn further to the south of Cascade Point in Berners Bay (Dunn Environmental Services, 1997a). The tentative conclusion of ADF&G is that the kelp on rock at Cascade Point is suitable spawning habitat for Pacific herring, and could be used in future years, if herring populations in Lynn Canal continue to grow.

Berners Bay and Echo Cove also hold substantial numbers of commercially valuable dungeness crab. Echo Cove typically has up to 100 commercial dungeness pots as well as a number of personal use pots during crabbing season.

Berners Bay Resources

Berners Bay supports a diversity of habitats important for birds, fish, and wildlife. The steep mountains and icefields ensure isolation of the area, which maintains its pristine and undeveloped character. The large glacially fed systems of the Lace and Antler Rivers drain into Berners Bay, depositing silts and sands forming extensive intertidal mudflats and estuaries. Along with Berners River and Johnson and Slate Creeks,

these rivers support a number of anadromous fish, including pink, chum, coho, sockeye salmon and dolly varden char, cutthroat and steelhead trout. The broad flood plains of the Bemers Bay watershed provide quality spawning and rearing habitat for fish as well as habitat for moose, bears, and waterfowl. Coastal old growth forests provide nesting habitat for bald eagles.

Estuaries at the mouth of anadromous streams are among the most sensitive habitats. Estuaries provide exceptional productivity as a result of the upwelling of nutrient rich deep waters from Lynn Canal and the large volume of freshwater flowing from the upland drainage of the Lace, Bemers, Antler, and Sawmill Rivers. The nutrients then become available for use by phytoplankton, which provide food for fish, shellfish, and other marine organisms. Thus, estuaries provide the foundation of most marine food chains and the productivity of offshore waters.

The estuarine wetlands are important for eulachon and other smelts which spawn in the Bemers, Lace and Antler Rivers. Juvenile salmon, especially chum and pink salmon, migrate from the rivers to the estuaries soon after emerging from the spawning gravels during their out migration adjustments to salt water.

In April and May, large concentrations of adult Pacific herring and eulachon migrate and spawn in the Bemers Bay area. Pacific herring spawn in vegetated shallows, including areas in the immediate vicinity of Cascade Point. The preferred substrate for herring is eelgrass. Pacific herring and eulachon provide the basis for higher trophic organisms.

Humpback whales migrate to Bemers Bay to feed on herring and eulachon. The American Peregrine Falcon feed in these waters during spring and fall migration. Under the Endangered Species Act, the Humpback whale and the falcon are federally listed as Endangered species.

The Steller Sea lion is federally listed as a Threatened species. A Steller Sea lion haulout area has been identified at Point Saint Mary. This area may be designated by the National Marine Fisheries Service as a Critical Habitat Area under the Endangered Species Act.

At lower elevations, the mudflats provide resting places for harbor seals, and pups during low tide. This area is especially important for harbor seal pups during the spring when the eulachon return to the Antler and Lace Rivers to spawn. Sea lions also concentrate in large numbers to feed on eulachon and herring.

Large concentrations of shorebirds, gulls, and bald eagles forage for eulachon smelt and herring in late April and early May. In particular, large numbers of bald eagles concentrate in Bemers Bay. In late summer, many eagles congregate along the mouths of the Lace and Antler Rivers to feed on salmon. The old growth coastal fringes of Bemers Bay may support nesting sites for bald eagles. Bald eagles prefer building their nests in large Sitka spruce trees within 400 meters of the water.

The Queen Charlotte Goshawk migrate through Bemers Bay to feed in summer and fall. Trumpeter swans may use the area for nesting, feeding, and overwintering periods. Other migratory birds may utilize Bemers Bay as a staging area.

The mountains and icefields surrounding Bemers Bay maintains a small isolated

Recreational Activities

population of moose. The deep snowfall drives the moose population to low elevation shoreline habitats during most winters. The beach fringe and estuary habitats of upper Bemers Bay and the Bemers, Lace and Antler Rivers are extremely important for moose during wintering and calving periods.

Bemers Bay provides for one of the highest quality habitat areas for spring through fall use for black bears. During this time, black bears migrate between the higher elevation dens and the grass flats along the beach. During late summer, black and brown bears congregate along salmon streams to feed.

Furthermore, Bemers Bay provides important recreational values. Recreational activities include kayaking, hiking, camping, hunting, sport fishing, wildlife viewing, boating, etc., in an undisturbed pristine environment. Currently, the only access to Bemers Bay is by plane or boat (Entire Bemers Bay Resources section from EPA, 1998).

The study area addressed in this section extends further than the study area used for other sections because of the nature of recreational opportunities in the area. Most recreational opportunities in the study area occur on the beach or on the water, and have been identified during scoping as: wildland experience, sport fishing, hunting, camping, hiking, boating, and viewing of scenery and wildlife.

On the proposed road alignment and at the Cascade Point proposed development site, recreation activities are limited. The proposed road alignment is a flagged, rugged trail through the forest. During field studies of two months duration in the summer of 1996, and field studies of one month duration in the summer of 1995, the principal investigator saw no one other than fellow workers or regulatory personnel on the proposed road alignment. The National Forest System lands proposed for the access road construction have the land use designation of "Scenic Viewshed" in the Tongass Land and Resource Management Plan (USDA Forest Service, 1997). One objective of this land use designation is to provide a spectrum of recreational and tourism opportunities. Semi-primitive to roaded experiences may be offered. These recreational experiences could range from semi-primitive, with a high probability of experiencing solitude and a minimum of on-site control to roaded use with little opportunity for challenge.

As evidenced by scoping comments, the portion of the study area that may be indirectly impacted is much more accessible, and more important to people recreating. This portion includes the beaches and waters of Echo Cove, Bemers Bay, and the shoreline portion of Point Bridget State Park to the west of Echo Cove. The shoreline area of Bemers Bay, including the popular Sawmill Creek area, is characterized as Semi-primitive Motorized. Semi-primitive Motorized environments are generally located at least 0.5 mile from better-than-primitive roads, but may be accessed by motorized boats or off-road vehicles (ORVs). There is a moderate probability of experiencing tranquility and solitude, but along shorelines there may be extensive boat traffic.

Point Bridget State Park has both trail and beach access to several public use cabins. One popular beach in the park has direct line-of-sight view of the Cascade Point development site, approximately one and one-half miles to the east. Echo Ranch Bible Camp is located on private land west of the mouth of Echo Cove. The Camp is

in operation from late April through September depending on access to Echo Cove. In the 1997 season 2,713 paid clients and 1,200 school children used the facility, there were 8,242 camper days (24 hour period of time spent by one person at camp), and up to 50 permanent and seasonal staff at the camp. The proposed development site at Cascade Point is privately owned by Goldbelt, Inc.

Noise

Existing noise levels along beaches in calm weather, with no swell, have been measured for the Juneau Access Improvements Draft EIS and the Forest Service. The levels, expressed in decibels weighted for the scale of human hearing (dBA) are similar, at 47 dBA, and 45 dBA, respectively. These levels should accurately portray the noise levels experienced by people who recreate in most places along the shore of Berners Bay, under those conditions (Dunn Environmental Services, 1996a).

Visual

The existing visual quality of Echo Cove and Berners Bay is excellent, with distinctive and varied landscape offering strong contrasts in form, color, and shape. From the rugged shoreline, forested slopes increase in steepness to alpine meadows and snow covered peaks. The horizontal shoreline, vertical tree trunks, and sloping mountain slopes combine to form pleasing contrasts, as do the varying blues, greens, greys, and whites of ocean, forest, mountain peaks, mist, and clouds.

Most of the area is classified as Existing Visual Condition Type 1 by the Forest Service meaning that it is undisturbed visually. Visitors and users of the area generally expect a high quality visual experience. The Cascade Point area is rated as Variety Class A, with distinctive landform characteristics such as rugged exposed peaks, steep slopes, and rocky shoreline. The remainder of the area is rated as Variety Class B, with a more moderate rolling landscape (USDA Forest Service, 1997).

Viewers of the proposed project landscape are primarily those partaking of a recreational activity, such as boating, fishing, hiking, hunting, or camping. The primary viewpoints of the proposed development area are from within Echo Cove and from the shoreline at Point Bridget State Park, and from Berners Bay north of the State Park shoreline. Although very few people view the proposed road alignment because of dense forest, people using water transportation view the project from distances ranging from a few feet to miles. The entire study area is seen from the Visual Priority Travel Routes and Use Areas in Lynn Canal, Berners Bay, and Echo Cove.

The Visual Quality Objectives (VQOs) for the proposed road vary from "Retention" in the foreground, to "Partial Retention" in the middle ground and background. A "Maximum Modification" VQO is assigned to areas that are unseen. These VQOs are defined below :

- Retention: Design activities to not be visually evident to the casual observer.
- Partial Retention: Design activities to be subordinate to the landscape character of the area.

- **Maximum Modification:** Activities may visually dominate the characteristic landscape, but must have visual characteristics similar to those of natural occurrences within the surrounding area or character type.

Opportunities for recreation in the area can be categorized in two classes: land based, and water based. Land based opportunities for recreation include hiking, hunting, wildlife viewing, and camping on the beaches of Echo Cove, on National Forest System lands, and within Point Bridget State Park. Water based recreation opportunities include sight-seeing from tour ships and ferries, non-motorized boating (kayaking), motor boating for pleasure, fishing, hunting, and air boating to and up the Bemers Bay river system.

The Forest Service maintains a public use cabin in Bemers Bay approximately five miles north of Cascade Point that is accessible by boat from Echo Cove. The State of Alaska also maintains two cabins in Point Bridget State Park that can be accessed by beach or boat from Echo Cove, and hiking trails from North Glacier Highway.

Hunting activity reported by the Alaska Department of Fish and Game for the Wildlife Analysis Area (WAA) surrounding Echo Cove, for the years 1984 - 1992 includes an average of less than 1 brown bear taken per year, five black bears per year, nine marten per year, and one mountain goat per year.

The Alaska Department of Fish and Game considers the Bemers Bay area to be a high use area for non-hunting wildlife use, compared to the Southeast Alaska coast in general. As the State of Alaska continues to upgrade North Glacier Highway, it is reasonable to assume that the area will become more popular for recreation activities.

A public survey of recreational use of the area was done in 1990 and 1991 for the Kensington Gold Project Draft EIS (Beck and Baird, 1991). Of the people who responded to the survey, nearly all said they used the Bemers Bay area. The greatest identified use was fishing, with wildlife viewing a close second. Other popular activities were camping, sightseeing, beach combing, kayaking, canoeing, skiing, and motor boating.

One outfitter has a permit to use Bemers Bay for commercial kayak trips. This outfitter launches the kayaks in Echo Cove and travels the shoreline past the proposed development at Cascade Point en route to Bemers Bay.

The Echo Ranch Bible Camp, located west of the mouth of Echo Cove, uses the meadows and beaches between Echo Cove and Point Bridget State Park for recreational activities during the spring, summer, and fall seasons.

Access

Prior to passage of the Alaska Native Claims Settlement Act (ANSCA), all lands in the area were managed by the Federal government, with unlimited public access. Until 1995, Goldbelt, Inc. managed their private lands in the area with the same policy, allowing public use with little or no restrictions except for prohibition of timber and firewood cutting. However, this policy led to abuses of the land including: litter, tree cutting, and unregulated camping. In 1995 the corporation instituted a policy of permitted entry on the land, which requires a permit be obtained before use of the

land. This policy applies to shareholders and the general public.

The access situation at this date consists of unlimited non-vehicular access to all National Forest System lands in the area. Those wishing access to Goldbelt, Inc. lands must apply for, and obtain a permit from Goldbelt, Inc. The CBJ campground and boat launch ramp requires only a launch ramp permit from the CBJ for use of the ramp. Use of the tidelands, from Mean High Water down, is regulated by the State of Alaska, with no access restrictions. A condition of construction of the Echo Cove boat launch ramp was intended to restrict vehicular use of the tidelands by placement of large boulders along the ramp. This effort has apparently failed, as vehicles can now drive around the boulders and use the tidelands for access within Echo Cove.

Land Ownership and Management

Figure 1-2, Echo Cove Land Ownership, shows the relationship of the various land management jurisdictions. In general, Goldbelt, Inc. owns most of the lands surrounding Echo Cove and north on the east side of the cove to Cascade Point. Echo Ranch Bible Camp owns land west of the mouth of Echo Cove. The CBJ owns and manages a five acre parcel at the head of Echo Cove.

The 100 foot wide strip of National Forest System land, proposed to be used for access road construction, leads from the end of North Glacier Highway through Goldbelt, Inc. private lands to the north boundary of the private lands. The proposed access road would use 2.5 miles of this strip of land. The alignment is surveyed with flagging, both new and old, all the way to a beach approximately one mile north of Sawmill Creek. This alignment is National Forest System land and could be used in its current condition for pedestrian access through Goldbelt, Inc. private lands to the National Forest System lands in Berners Bay.

The boundary between Goldbelt, Inc. private land and National Forest System land follows east-west and north-south boundary lines, resulting in a zig-zag boundary. The boundary at one point just inside the mouth of Echo Cove segments the Goldbelt, Inc. lands because the National Forest System land reaches State of Alaska tidelands.

Cultural Resources

A cultural resources survey was completed along the proposed access road alignment and the proposed Cascade Point development area in the summer of 1996. In addition, interviews were conducted by Dr. Wallace Olsen with Tlingit elders Cecilia Kunz and Rosa Miller regarding traditional use of the Echo Cove and Cascade Point areas.

Prehistory

Berners Bay was the traditional territory of the Wooshkeetaan clan of the Auk Tlingit. The bay was "famous among the Auk people as a source of berries" (Goldschmidt and Haas 1946). Interviews with Ms. Kunz and Ms. Miller, yielded no specific information regarding the Cascade Point project area. Neither of these women know of any permanent villages, burials, or petroglyphs in Echo Cove (Yarborough, 1996). Both did mention picking berries in the Echo Cove area as children.

Consultation

Two consultation meetings were held on March 10, 1997, with Juneau area Natives

to specifically inquire from the Native community if there was a concern about development of this project. Both Ms. Kunz and Ms. Miller were present at one of the meetings. Six other individuals attended the meetings to discuss this area. There were no concerns voiced during either of the meetings for the proposed project and any impacts it may have on archaeological sites in Echo Cove. Considerable information was brought up about the Berners Bay region; however, the focus specifically on Echo Cove did not bring up any concerns.

One individual has brought up concerns, subsequent to these meetings, stating that there was a village in Echo Cove, where the Echo Ranch Bible Camp is now located. Furthermore, this individual has indicated that there is a shaman burial located within the road alignment. Though attempts have been made to substantiate this information about the shaman burial, other Juneau area elders have not corroborated this information. Discussions with other people knowledgeable about this area and this subject have clearly stated their knowledge that there is indeed a shaman burial; however, it is in a different location, not in Echo Cove.

Previous Surveys

Previous surveys in the Echo Cove area are scant in number; Berners Bay has received by far a much greater concentration of surveys throughout the years. The earliest survey conducted in the Echo Cove area was a reconnaissance survey conducted in 1978 by Clark and Moss to consider a boat launch facility proposed by Alaska Department of Transportation. The survey focused on the southeast shore of Echo Cove. A variety of recent campsites and the remains of an old wooden cabin were found (Clark, 1978).

The second survey for the Echo Cove area was completed for the Cowee Davies Timber sale in 1980. The closest surveys to Echo Cove were at the Sawmill Creek area where log transfer facility (LTF) construction was proposed. It is reported that Sawmill Creek was an area used for berry picking by people who lived at the Berners Bay Village site. One informant reported the use of berry patches one fourth to one half mile up Sawmill Creek (Moss, 1981). Surveys concentrated only on the localities of the LTFs and did not extend up the river to the reported kitchen midden areas. No cultural resources were identified during this survey of the LTF localities.

In 1985 additional surveys were conducted specifically along Sawmill Creek to identify the kitchen middens..It was reported that the kitchen middens were seen used thirty years previous. Surveys were conducted both upstream and downstream from the proposed bridge crossing (approximately 3/8 mile upstream) for one-fourth of a mile in each direction. No cultural resources were found along the creek (Davis, 1985). Davis explains that if this area was used only for berry picking as Moss' informant suggested then little if any evidence would remain to indicate cultural use of the area. No culturally modified trees (CMTs) were noted.

Dames and Moore conducted surveys for the Juneau Access Improvements project in 1994. A portion of this survey incorporated the, then proposed alignment above the east shore of the Echo Cove project area. A number of sites were identified within the vicinity of the Echo Cove project area, though none are directly within the boundaries of the project area. Numerous CMTs were noted along the survey alignment.

Table 3-1 displays the sites that were found within a one and one-half mile radius of

the project area. These sites include an old trail, the remains of two cabins, a small shell midden, a sawmill and a shipway. It is possible that the shell midden may be associated with the kitchen midden site reported in the 1980s. This site was determined eligible during the Juneau Access Improvements Draft EIS analysis.

Table 3-1

Cultural Resource sites within a one and one-half mile radius of the Proposed Action study area.

Site	Date	Location	Eligibility ⁻
JUN 234	Early 20th Century	Echo Cove	Unknown*
JUN 672	Early 20th Century	Echo Cove	No*
JUN 673	AD 1950	Sawmill Creek	Yes*
JUN 674	Early 20th Century	Sawmill Creek	Yes*
JUN 675	Early 20th Century	Sawmill Creek	Yes*
JUN 676	Early 20th Century	Sawmill Creek	Yes*
JUN 710	Early 20th Century	Cascade Point	Yes*

⁻Site does/does not qualify for inclusion in the National Register, and if so, it is according to which criterion as defined by 36 CFR 60.4.

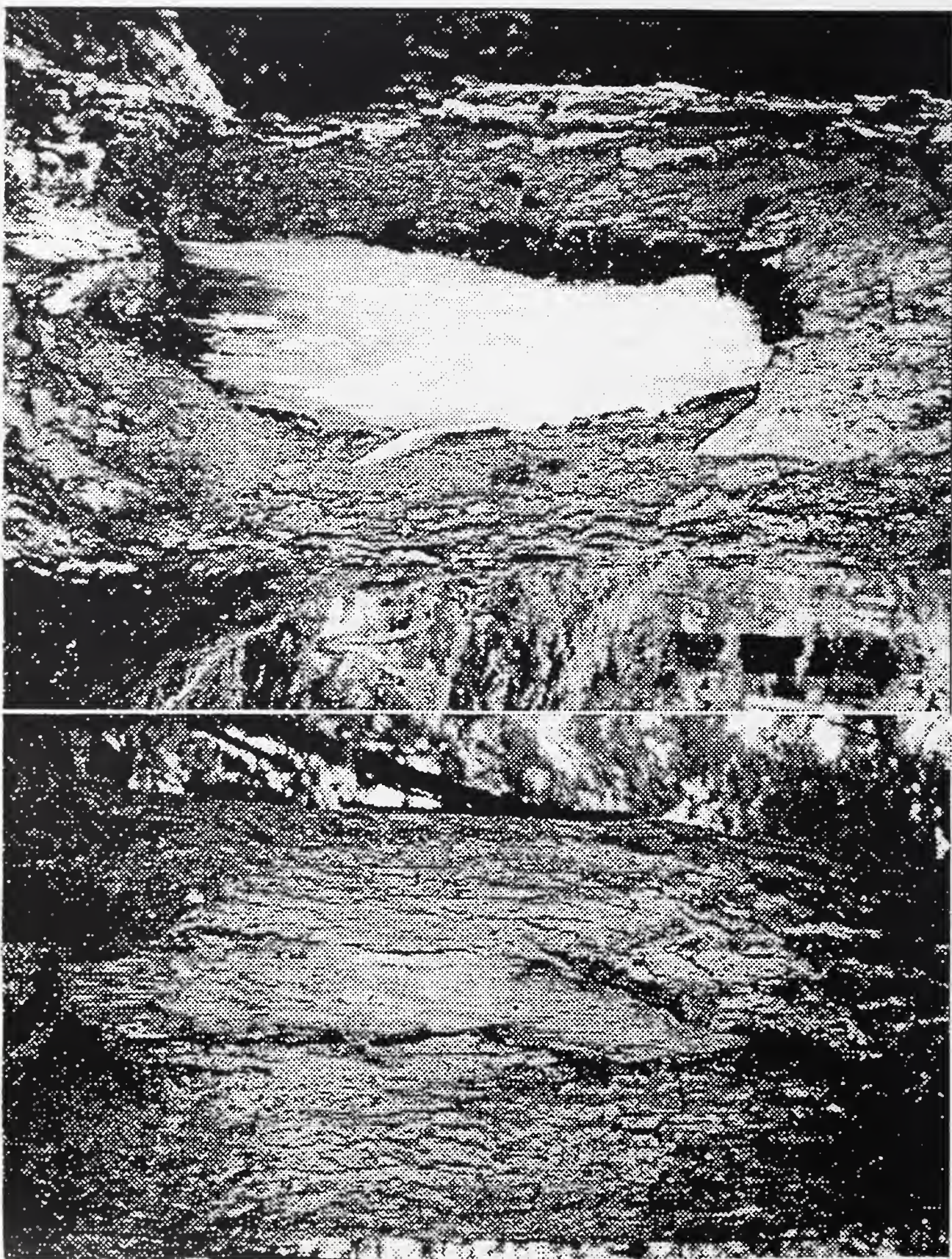
* Eligibility previously determined for the Juneau Access Improvements project
+ Results of this project survey, see below.

PROJECT AREA SURVEY RESULTS

Two cultural sites were found during the 1996 survey of the proposed access road alignment and proposed Goldbelt, Inc. Development area. The first was a number of CMTs along the road alignment, and the second is a small shell midden and clustering of CMTs.

Along the proposed access road 86 CMTs and a large number of cut tree stumps were found. All of the CMTs were bark-stripped, and all but one were hemlocks (Photograph 3-1, Culturally Modified Tree). An account by Tlingit elder, Jessie Dalton, describes the use of hemlock bark as a sweet confection, called *sux'*. *Sux'* is made from the inner bark of the hemlock tree (Newton and Moss, 1984). The processing is quite involved and results in a sweet tender treat. The majority of the

PHOTOGRAPH 3-1 CULTURALLY MODIFIED TREES



trees were recorded, noting features such as type of scar, aspect, distance to both fresh and saltwater, etc.

On Goldbelt, Inc. private land, 159 CMTs were found. This large quantity of trees leads to the speculation that the bark was most likely processed at this site. In addition to the CMTs, a small shell midden and two small depressions were identified during the survey. Shovel testing at the site identified shell fragments and a small amount of charcoal. This site, JUN 710, is probably the remains of a temporary campsite. The grove of CMTs and the midden found at the proposed development site has been determined eligible for the National Register of Historic Places, under 36 CFR 60.4 Criterion (d) as a site that may yield information important in prehistory or history (Yarborough, 1996).

Subsistence

Subsistence refers to the traditional and customary use of fish and game and other renewable natural resources by rural Alaska residents. The project area is within the CBJ. Residents of the CBJ are classified as non-rural and do not qualify as subsistence users. Fishing and hunting by CBJ residents are considered sport and personal use activities regulated by ADF&G.

The project area is far from rural communities, and there is no evidence that the area is used by those who qualify as subsistence users.

However, Goldbelt, Inc. shareholders use the area for berry harvesting, and many Juneau residents dig clams on the beaches and participate in other personal use activities on the water.



Chapter 4

Environmental Consequences

Environmental Consequences

Introduction

This chapter of the Final EIS provides the analytical basis for comparison of project alternatives. Anticipated environmental effects associated with the Proposed Action and other action alternatives are discussed with respect to the existing environment as well as in comparison to the No Action Alternative. Proposed mitigation measures are discussed as well.

Impact analysis discussions are presented under the same headings presented in Chapter 3, Affected Environment. However, they are grouped to address the three issues raised in scoping. In addition, several other regulatory requirements are addressed, such as impacts to wetlands and cultural resources.

Scoping identified three significant issues to be addressed in this EIS. These issues are:

- Impacts to Wildlife
- Impacts to Fish
- Impacts to Recreational Activities

Cumulative impacts are also addressed, taking into account other reasonably foreseeable actions in the Berners Bay area, including:

- Cascade Point Development
- Jualin Mine Exploration
- Kensington Gold Project
- Juneau Access Improvements
- Lace River Hydroelectric Project
- Goldbelt, Inc./Forest Service Land Exchange

ISSUE 1, IMPACTS TO WILDLIFE

Modeling of habitat capability impacts for four management indicator species: brown bear, black bear, mountain goat, and marten (Dunn Environmental Services, 1997c), was derived from models completed for the Juneau Access Improvements Draft EIS (Dames and Moore, 1997). Two alternatives considered in the Juneau Access Improvements Draft EIS would use the same alignment as the proposed Cascade Point access road.

The impacts on the management indicator species are based on calculated reductions in habitat capability using three types of impact categories: permanent loss of habitat from land alteration, permanent displacement of animals from the vicinity of developed areas, and temporary disturbance of animals. Impacts include wildlife mortality from vehicle collisions, creation of a barrier to movement of animals,

increased hunting pressure, and disturbance of animals in surrounding habitat. Roads have one set of habitat reduction factors, while developments have another set of habitat reduction factors. These habitat reduction factors take into account the impacts discussed above, and extend for up to five miles into surrounding habitat (Schoen, 1993) depending on which species are modeled.

The model has assigned impacts to the carrying capacity of the habitat for these species based on displacement of animals due to human use of new facilities or the road. Because this area is adjacent to a public boat ramp, the narrow water passage that boats must travel to leave the boat ramp is within two miles of a Forest Service recreational cabin, and within one mile of a developed private church camp, the model may be duplicating displacement in the area that is already taking place. Because the area potentially impacted by the Proposed Action currently receives a high level of human use, the modeled results are likely over-estimating the impacts.

The models may also be over-estimating impacts to brown bear, black bear, and marten because of existing hunting and trapping regulations. One of the variables in the model is increased hunting and trapping pressure as a result of increased access. If regulations prohibit hunting and trapping in the area, the impact estimated by the model could be over-estimated. There is currently a city ordinance that prohibits the discharge of firearms within one-half of a mile from streets or roads within the City and Borough of Juneau (CBJ). There is also a state trapping regulation that prohibits trapping within one-quarter of a mile from the coast on the existing Juneau road system. It is likely that the Game Board would consider extending this restriction to new roads that develop along the mainland coast.

A study completed for the Forest Service by the University of Washington (Fox, 1979) examined mountain goat wintering habitat along Echo Cove, in the proposed study area. This study found mountain goats wintering in the forest close to the proposed alignment.

In some years, mountain goats winter in habitat that is bisected by the proposed road corridor (Fox, 1979). The use of this habitat would likely be lost if the road were developed. What impact this would have on the local mountain goat population is not known. Because mountain goats use other nearby areas at higher densities, they do not use the area on the proposed road every year. Also, because the winter there was documentation of mountain goat use on the proposed road alignment and there was not a high snow fall, we can conclude that the wintering habitat on the proposed road is not critical to the survival of the entire local herd. The above model predicts less than 1% decline in carrying capacity as a result of the project. All of the alternatives that result in road development would have the same impact on local mountain goat population.

Impacts to bald eagles are based on proximity of development to bald eagle nest trees. A distance of 330 feet has been accepted as sufficient to avoid impacts or disturbance to bald eagles and their nests.

Alternative A - No Action

Selection of the No Action Alternative would not allow construction of the road as described in the Proposed Action which would eliminate any direct effects on wildlife due to the road construction and road use.

In response to comments received on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent if the No Action Alternative were selected. Goldbelt, Inc. has verified that they would pursue construction of a road on private land and state tidelands under Alternative A - No Action. Therefore, the following wildlife impacts are based on the assumption that even if authorization for the road easement were not granted, development at Cascade Point is reasonably foreseeable. The analysis is based on modeled impacts of a human community of 11 to 500 people at Cascade Point.

In the Alaska Department of Fish and Game Wildlife Analysis Area (WAA) 2514, stretching from Eagle River to, and including, the Sawmill Creek drainage, the analysis shows a reduction in the assumed carrying capacity of management indicator species due to the Cascade Point development as follows:

Brown bears - reduction of 22% of the assumed carrying capacity.

Black bears - reduction of less than 2% of the assumed carrying capacity.

Mountain goats - reduction of less than 1% of the assumed carrying capacity.

Martens - reduction of 13% of the assumed carrying capacity.

If an access road were built using only Goldbelt, Inc. private land and state tidelands, modeled impacts to brown bears, black bears, mountain goats, and martens would be indistinguishable from modeled impacts due to the Proposed Action.

The road on Goldbelt, Inc. land and state tidelands would pass within 330 feet of three bald eagle nests on Goldbelt, Inc. land. No bald eagle nests are within 330 feet of the proposed reasonably foreseeable development area at Cascade Point.

If the road were not built or water access used, there would not be construction within the beach fringe area. If the road were built off National Forest System land on private land or tidelands, the physical beach fringe area would be impacted. The importance of beach fringe habitat to wildlife has been incorporated into the models used to assess marten, black bear, and brown bear. These impacts are discussed previously in this section.

Alternative B - Proposed Action

Direct wildlife impacts for the Proposed Action are based on the development of the proposed access road, as described in Chapter 2.

Habitat reductions are calculated using a reduction factor applied to the habitat in the impact area of the project. Habitats are rated differently for different species, depending on their habitat needs. Optimal brown bear habitat consists of old growth forest along salmon streams and beach fringe during the spring through the fall. Optimal black bear habitat is similar to brown bear habitat, but black bears are highly adaptable to different habitats; therefore, the models combine habitat used during all seasons. Habitat capability models for mountain goats are based on the value of habitat during the winter when they use old growth forest with a closed canopy near to steep cliffs and rocky terrain. Martens also prefer old growth forest with a closed canopy. Marten habitat is also related on the basis of winter habitat value because

the winter season is most critical.

In the WAA 2514, encompassing the project study area, the analysis shows reductions in the assumed carrying capacity of management indicator species due to the access road construction and use are as follows:

Brown bears - reduction of 1% of the assumed carrying capacity.

Black bears - reduction of 4% of the assumed carrying capacity.

Mountain goats - reduction of less than 1% of the assumed carrying capacity.

Martens - reduction of 10% of the assumed carrying capacity.

This alternative would allow the possibility of hiking from the proposed Cascade Point facility to Sawmill Creek, a distance of approximately one mile. Although no marked trail to the area from Cascade Point exists now, the development of such a trail would be a strong probability. An increased number of pedestrian visitors to this popular bear viewing area may decrease the number of bear viewing opportunities for all visitors, and could increase the chances for negative human/bear encounters, both at Sawmill Creek, and in the forest on the way to and from the area.

Analysis of impacts to bald eagles is based on proximity of development to nest trees, and shows no probable impacts to bald eagles along the access road, because no bald eagle nests are located within 330 feet of the proposed road alignment.

The road has been located within the beach fringe area because it is relatively flat and provides the best terrain for the road location. Locating the road outside the beach fringe would require moving it up the hillside to steep slopes on less stable soils and requiring more cut and fill. Consequently, locating the road outside the beach fringe area would have greater adverse environmental effects. The importance of beach fringe habitat to wildlife has been incorporated into the models used to assess marten, black bear, and brown bear. These impacts are discussed previously in this section.

Construction of the road would likely lead to some level of development on private land at Cascade Point. The effects of this development on wildlife would be considered indirect since the development would not occur within the road corridor, and the majority of the development would not occur until the road had been built.

The analysis of indirect effects to wildlife is based on modeled impacts of a human community of 11 to 500 people at Cascade Point.

In the Alaska Department of Fish and Game Wildlife Analysis Area (WAA) 2514, stretching from Eagle River to, and including, the Sawmill Creek drainage, the analysis shows a reduction in the assumed carrying capacity of management indicator species due to the Cascade Point development as follows:

Brown bears - reduction of 22% of the assumed carrying capacity.

Black bears - reduction of less than 2% of the assumed carrying capacity.

Mountain goats - reduction of less than 1% of the assumed carrying capacity.

Martens - reduction of 13% of the assumed carrying capacity.

Alternative C

The modeled wildlife impacts of this alternative are the same as those of the proposed action. However, the characteristic of decreased vehicular access that distinguishes this alternative from the Proposed Action would tend to decrease wildlife disturbance along the access road corridor, thereby resulting in less of a reduction in habitat capability. There would be no probable impacts to bald eagles. The possibility of impacts to Sawmill Creek bear viewing opportunities and negative human/bear encounters would be less with this alternative than with the proposed action because this alternative would limit vehicular access to Cascade Point to only those having business there.

Issue 2, Impacts to Fish

Alternative A, No Action

Selection of the No Action Alternative would not allow construction of the road as described in the Proposed Action which would eliminate any direct effects on fish due to the road construction and road use.

In response to comments received on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent if the No Action Alternative were selected. Goldbelt, Inc. has verified that they would pursue construction of a road on private land and state tidelands under Alternative A - No Action. Therefore, the following impacts to fish are based on the assumption that even if authorization for the road easement were not granted, development at Cascade Point is reasonably foreseeable.

The Cascade Point development site contains two very small intermittent streams that flow into beach gravels before reaching tidewater. Cascade Creek would be crossed by the portion of proposed access road to be constructed on Goldbelt, Inc. land. Cascade Creek is assumed to contain resident populations of Dolly Varden char and cutthroat trout upstream of the proposed crossing site.

The proposed crossing site on Cascade Creek is at a very high gradient stretch of the creek, at a rock gorge approximately 20 feet deep. The crossing would be accomplished with a bridge that spanned the entire creek. No impacts to resident fish, or water quality impacts downstream of the Cascade Creek crossing are anticipated. Short-term construction related water quality impacts may occur on the two small intermittent streams at the Cascade Point development site.

The log and equipment transfer bulkhead proposed for the beach just south of Cascade Point would be constructed of shot rock behind a log bulkhead, effectively covering all intertidal and benthic organisms beneath the fill. Short-term water quality impacts of turbidity could be expected during construction. The bulkhead would be constructed immediately to the south of an intertidal rock outcrop of approximately 150 square feet that is covered with kelp similar to the kelp used by Pacific herring for spawning activities along the shore to the north. The bulkhead would presumably not impact future spawning activities of Pacific herring, but would cover potential rock

substrate that could be used for herring spawning.

Should an access road be built on Goldbelt, Inc. land and state tidelands, as described in Chapter 2, approximately two acres of tidelands would be filled. This would result in short-term sedimentation of the water and long-term loss of productivity on the filled area of the beach, including clams and other intertidal creatures.

Alternative B, Proposed Action

On National Forest System land, the proposed access road crosses no streams containing either anadromous or resident fish. Short-term direct impacts to fish in saltwater downstream of the proposed road may occur as a result of short-term water quality impacts during construction in streams crossed by the proposed road. These impacts would be avoidance of turbid water by saltwater fishes traveling near shore, and possibly short-term distress of intertidal organisms at the mouths of the streams. Operational impacts of the proposed road to fish are expected to be minimal.

Construction of the road would likely lead to some level of development on private land at Cascade Point. The effects to fish from this development would be considered indirect since the development would not occur within the road corridor and the majority of the development would not occur until the road had been built.

The Cascade Point development site contains two very small intermittent streams that flow into beach gravels before reaching tidewater. Cascade Creek would be crossed by the portion of proposed access road to be constructed on Goldbelt, Inc. land. Cascade Creek is assumed to contain resident populations of Dolly Varden char and cutthroat trout upstream of the proposed crossing site.

The proposed crossing site on Cascade Creek is at a very high gradient stretch of the creek, at a rock gorge approximately 20 feet deep. The crossing would be accomplished with a bridge that spanned the entire creek. No impacts to resident fish, or water quality impacts downstream of the Cascade Creek crossing are anticipated. Short-term construction related water quality impacts may occur on the two small intermittent streams at the Cascade Point development site.

The log and equipment transfer bulkhead proposed for the beach just south of Cascade Point would be constructed of shot rock behind a log bulkhead, effectively covering all intertidal and benthic organisms beneath the fill. Short-term water quality impacts of turbidity could be expected during construction. The bulkhead would be constructed immediately to the south of an intertidal rock outcrop of approximately 150 square feet that is covered with kelp similar to the kelp used by Pacific herring for spawning activities along the shore to the north. The bulkhead would presumably not impact future spawning activities of Pacific herring, but would cover potential rock substrate that could be used for herring spawning.

Alternative C

This alternative would have the same construction impacts to fish as the Proposed Action, Alternative B. Operational impacts of this alternative may be less than the proposed alternative because of decreased vehicular access to Cascade Point.

Issue 3 - Impacts to Recreational Activity

Impacts to recreational opportunities can be split into three factors: visual, noise, and increased use of recreational resources. These factors contribute to the quality of recreational experience in the area.

No physical disturbances are proposed for lands within the area immediately northeast of Goldbelt, Inc. lands at Cascade Point that are designated as LUD II. Therefore, there will not be any direct effect to the LUD II lands. There may be the indirect effect of an increase in dispersed recreation. This increase would still be within the standards and guidelines of the new Tongass Land and Resource Management Plan (USDA Forest Service, 1997). Consequently, the indirect effects would be consistent with the management direction for the LUD II area. This effect would be the same for all alternatives if a road is built. If, under Alternative A - No Action no road is built, then there would not be any indirect effect of an increase in dispersed recreation.

Alternative A, No Action

Selection of the No Action Alternative would not allow construction of the road as described in the Proposed Action. This would eliminate any direct effects on recreational activities due to road construction and road use.

In response to comments received on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent if the No Action Alternative were selected. Goldbelt, Inc. has verified that they would pursue construction of a road on private land and state tidelands under Alternative A - No Action. Therefore, the following impacts to recreational activities are based on the assumption that even if authorization for the road easement were not granted, limited development at Cascade Point is reasonably foreseeable.

Recreational Activities

Impacts to recreational activities resulting from the proposed Cascade Point access road were analyzed by splitting the issue into three factors: visual, noise, and increased use of recreational resources. A summary of the analysis on pages 4-5 and 4-6 shows expected visual and noise impacts of the proposed access road to be consistent with Forest Service objectives and guidelines for visual quality and noise.

The reasonably foreseeable actions at Cascade Point could potentially consist of a tourism lodge, utilities, a gas station, and a convenience store. These facilities would both increase the number of people living at the site plus the number of people visiting the area and recreating there. There could also be an impact to boaters and kayakers in Berners Bay from increased ferry, barge, and boat traffic. This activity would increase noise levels and visual effects.

Visuals

A visual analysis of reasonably foreseeable development proposed at Cascade Point was done, viewing the activities from two popular viewpoints: on the water inside Echo Cove, and on the beach at Point Bridget State Park (Dunn Environmental Services, 1996c). The visual analysis used the technique of comparing existing views with a rendering of the proposed development. Photographs 4-1 and 4-2 show the existing views from the two viewpoints. The renderings following each photograph show the proposed developments from each of the viewpoints (Figure 4-2, Proposed Cascade Point Development from Viewpoint 1, and Figure 4-3, Proposed

Cascade Point Development from Viewpoint 2). In this case, the development would be on private Goldbelt, Inc. land and State of Alaska tidelands, and therefore not subject to Forest Service Visual Quality Objectives for the area. However, because viewers of the area expect a quality experience, and because the issue was important during scoping, the views are analyzed using standard analysis methods.

From both viewpoints, the proposed dock facility would result in a strong contrast with the surrounding shoreline, while the lodge and other proposed upland facilities would blend well with the surrounding landscape. From both viewpoints, the proposed Cascade Point facility would probably result in a moderate adverse visual impact. In contrast, the proposed facility at Cascade Point would include a public viewpoint that would provide an excellent view of Bemers Bay, Lynn Canal, and the Chilkat Mountain Range.

Noise

This noise analysis includes reasonably foreseeable activities at the proposed Cascade Point development site, including a fast ferry facility, lodge, commercial fishing support, and a gas station/convenience store.

The analysis assumes compliance with the CBJ noise policy (CBJ, 1996) at the proposed Cascade Point development site, as well as a traffic level on the proposed access road similar to the traffic predicted for the Juneau Access Improvements, Alternative 4 that would feature a fast ferry operation out of Bemers Bay. The CBJ noise ordinance requires a steady state noise level no higher than 65 dBA daytime, and 55 dBA nighttime at the property line. This steady state noise level would include generator noise as well as vehicle noise averaged hourly. The noise analysis showed no detectable increase in sound levels at either Point Bridget State Park or Sawmill Creek. Those traveling near shore of the proposed Cascade Point development in non-motorized vessels would undoubtedly notice an increase in noise levels (Dunn Environmental Services, 1996a).

If the road were constructed on Goldbelt, Inc. land and state tidelands, there would be a 500 foot stretch of road below tideline near the mouth of Echo Cove (see Chapter 2, Alternatives). This option would have visual and noise impacts, as well as the loss of several acres of public beach. This option would move vehicular traffic onto the beach, where it would both be seen and heard by people who recreate on the water and the beach in Echo Cove.

Additionally, if water-based transportation were used from Echo Cove to Cascade Point, either increased use of the existing launch area or construction of a new dock within the cove would be likely. These actions would negatively affect the quality of recreational activity for those using Echo Cove. These negative impacts could be increased noise from both wheeled vehicles using the launch area and from vessels transporting goods and people to the lodge. In addition, increased vessel traffic in Echo Cove and in the narrow entrance to Echo Cove could reduce the character of the cove for people who recreate.

Alternative B, Proposed Action

Direct Visual Effect

Visibility of the proposed access road would be apparent only to users of the road

and nearby forest. These visitors would see the road corridor as a cleared area 70 to 100 feet wide. The road would not be readily visible from boats on the water or visitors walking along the shore. The road corridor would be visible from aircraft flying directly over it. Aircraft flying over the water would not easily view the road corridor. The visual impacts of the proposed access road would be consistent with the Forest Service Visual Quality Objective (VQO) of Retention for the area (USDA Forest Service, 1997). The Retention VQO is a desired level of scenic quality and diversity of natural features based on physical and sociological characteristics of the area in which management activities are not evident to the casual Forest visitor. In addition, the access road would offer the potential for excellent views of Lynn Canal and Berners Bay from the road in the area where the road would climb over a section of steep and rocky terrain approximately one-half mile north of the entrance of Echo Cove.

Visual analysis of the reasonably foreseeable development at Cascade Point is discussed in the Cumulative Effects section of this chapter.

Direct Noise Effect

A noise impact analysis was completed (Dunn Environmental Services, 1997b), using standard methods and formulas for attenuation of noise over distance (Federal Highway Administration, 1980). The analysis assumes compliance with the CBJ noise policy (CBJ, 1996) at the proposed Cascade Point development site. The analysis also assumes a traffic level on the proposed access road similar to the traffic predicted for a Juneau Access Improvements alternative that would feature a fast ferry operation out of Berners Bay.

An increase of noise levels from 47 dBA to 54 dBA could be expected at the CBJ boat ramp in Echo Cove as a result of increased traffic on the access road. This increase in noise is well within Forest Service guidance for maximum increases in noise levels (USDA Forest Service, 1980), and results in an acceptable noise level using Federal Highway Administration noise abatement criteria. For comparison, a noise level of 57 dBA is considered acceptable for "lands on which serenity and quiet are of extraordinary significance..." (Federal Highway Administration, 1982).

Direct Recreational Activities Effect

The third cause of concern for recreation visitors to this area is the increased use of Berners Bay resources due to increased use from the proposed access road. The focus of this concern is increased use of the Sawmill Creek area by pedestrians hiking to the area from the end of the proposed road, or from the proposed development at Cascade Point. As discussed in the Wildlife section above, two possibilities for impact are disruption of bear viewing opportunities and increased negative human/bear encounters. Other possibilities for impact would include increased use of the area for camping and picnicking (among other uses), with attendant possibilities for degradation of the natural environment, such as littering, improper disposal of human waste, and improper maintenance of camp fires. Lessening of the recreation experience of solitude may occur due to increased use.

In contrast, increased opportunity to use recreational resources described above is viewed as a positive effect by others who may not have the ability to travel by water to the Sawmill Creek area.

Construction of the road would likely lead to some level of development on private

land at Cascade Point. The effects to recreational activities from this development would be considered indirect since the development would not occur within the road corridor and the majority of the development would not occur until the road had been built.

Indirect Recreational Activities Effects

Impacts to recreational activities resulting from the proposed Cascade Point access road were analyzed by splitting the issue into three factors: visual, noise, and increased use of recreational resources. A summary of the analysis on pages 4-5 and 4-6 shows expected visual and noise impacts of the proposed access road to be consistent with Forest Service objectives and guidelines for visual quality and noise.

The reasonably foreseeable actions at Cascade Point could potentially consist of a tourism lodge, utilities, a gas station, and a convenience store. These facilities would both increase the number of people living at the site plus the number of people visiting the area and recreating there. There could also be an impact to boaters and kayakers in Berners Bay from increased ferry, barge, and boat traffic. This activity would increase noise levels and visual effects.

Indirect Visual Effect

A visual analysis of reasonably foreseeable activities proposed at Cascade Point was done, viewing the activities from two popular viewpoints: on the water inside Echo Cove, and on the beach at Point Bridget State Park (Dunn Environmental Services, 1996c). The visual analysis used the technique of comparing existing views with a rendering of the proposed activity. Photographs 4-1 and 4-2 show the existing views from the two viewpoints. The renderings following each photograph show the proposed developments from each of the viewpoints (Figure 4-1, Proposed Cascade Point Development from Viewpoint 1, and Figure 4-2, Proposed Cascade Point Development from Viewpoint 2). In this case, the development would be on private Goldbelt, Inc. land and State of Alaska tidelands, and therefore not subject to Forest Service Visual Quality Objectives for the area. However, because viewers of the area expect a quality experience, and because the issue was important during scoping, the views are analyzed using standard analysis methods.

From both viewpoints, the proposed dock facility would result in a strong contrast with the surrounding shoreline, while the lodge and other proposed upland facilities would blend well with the surrounding landscape. From both viewpoints, the proposed Cascade Point facility would probably result in a moderate adverse visual impact. In contrast, the proposed facility at Cascade Point would include a public viewpoint that would provide an excellent view of Berners Bay, Lynn Canal, and the Chilkat Mountain Range.

Indirect Noise Effect

This noise analysis includes reasonably foreseeable activities at the proposed Cascade Point development site, including a fast ferry facility, lodge, commercial fishing support, and a gas station/convenience store.

The analysis assumes compliance with the CBJ noise policy (CBJ, 1996) at the

**PHOTOGRAPH 4-1 VIEW FROM ECHO COVE
LOOKING NORTH, VIEW POINT 1**





**FIGURE 4-2 PROPOSED CASCADE PT. DEVELOPMENT
FROM PT. BRIDGET STATE PARK**

proposed Cascade Point development site, as well as a traffic level on the proposed access road similar to the traffic predicted for the Juneau Access Improvements, Alternative 4 that would feature a fast ferry operation out of Bemers Bay. The CBJ noise ordinance requires a steady state noise level no higher than 65 dBA daytime, and 55 dBA nighttime at the property line. This steady state noise level would include generator noise as well as vehicle noise averaged hourly. The noise analysis showed no detectable increase in sound levels at either Point Bridget State Park or Sawmill Creek. Those traveling near shore of the proposed Cascade Point development in non-motorized vessels would undoubtedly notice an increase in noise levels (Dunn Environmental Services, 1996a).

Alternative C

This alternative would be physically the same as the Proposed Action. Visual impacts would be the same. This alternative would limit vehicular access onto the access road to those with business at the Cascade Point development or Goldbelt, Inc. shareholders with permits to use the land. This distinction would decrease noise from the access road and likely lessen the number of people hiking to the Sawmill Creek area. This could result in less impact to the recreational activities than discussed above, for Alternative B.

WETLANDS

The 404 (b)(1) guidelines of the Clean Water Act requires that impacts to special aquatic sites, including wetlands, be avoided where less damaging and practicable alternatives exist. Remaining unavoidable impacts must be minimized, and mitigation may be required where appropriate and practicable.

Alternative A, No Action

The No Action Alternative, in terms of wetlands, would mean the avoidance of all wetland impacts requiring Corps of Engineers authorization. This would limit possible activities to construction of a lodge and a piling supported dock at Cascade Point, with marine access either from the existing launch ramp in Echo Cove or a new piling supported dock. Piling supported dock facilities would require Corps of Engineers authorization under Section 10 of the Rivers and Harbors Act, but would not impact wetlands regulated by the Clean Water Act.

In response to comments received on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent if the No Action Alternative were selected. Goldbelt, Inc. has verified that they would pursue construction of a road on private land and state tidelands under Alternative A - No Action. Therefore, the following impacts to wetlands are based on the assumption that even if authorization for the road easement were not granted, limited development at Cascade Point is reasonably foreseeable.

The proposed development at Cascade Point (private access road, staging area, and log and equipment transfer bulkhead) would result in the filling of approximately 2.5 acres of forested wetlands and 0.2 acres of scrub shrub/emergent wetlands along the beach. Reasonably foreseeable development at Cascade Point (gas station/convenience store, fast ferry dock, and electrical generator building) would result in the filling of approximately an additional five acres of forested wetlands.

The functional analysis of the estuarine wetland on the beach at Cascade Point showed high ratings for the functions of "ground water discharge" and "regional ecological diversity". Other wetland functions were rated moderate or low. Definitions of high rated functions are discussed in Chapter 3, Affected Environment.

Initial developments at the Cascade Point site are planned to be incorporated into the reasonably foreseeable design with no change in footprint. The log and equipment staging area would eventually be a parking lot and vegetated open area for the development, while the location of the equipment and log transfer bulkhead would allow incorporation of the fill within the footprint of the proposed reasonably foreseeable dock facility.

Construction of a road on Goldbelt, Inc. land near the shoreline of Echo Cove, and on state tidelands would require fill in wetlands, and Corps of Engineers authorization under the Clean Water Act would still be required. This option would use less forested wetlands than the proposed action, but more estuarine, or intertidal wetlands. While the beach alignment may be feasible from a construction standpoint, a number of environmental factors on that alignment would make construction there environmentally unacceptable. Storm water control would be very costly and possibly not effective so near to the water. The route would necessitate crossing a number of steep and wide ravines. The route would be inconsistent with the Alaska Coastal Management Plan, which requires transportation facilities to be sited inland unless no prudent and feasible alternatives exist. In addition, the route would pass within 330 feet of three bald eagle nests on Goldbelt, Inc. land. From a logistics standpoint, construction of such a route would create the potential for parallel highways through the corridor, with the Forest Service retaining ownership of the proposed alignment uphill. Finally, such a route would be inconsistent with Goldbelt, Inc. planning and policy to retain the Echo Cove beachfront in a natural condition for the use and enjoyment of their shareholders and families.

Alternative B, Proposed Action

The proposed access road would result in the filling of approximately seven acres of forested wetlands on National Forest System lands. The footprint of the road would be approximately 70 feet wide, and approximately 4,450 linear feet of wetlands would be filled. These forested wetlands typically have a tree stratum of Western hemlock and Sitka spruce; a shrub layer of several species of blueberry and huckleberry, devils club, and rusty Menziesia; and a broadleaf herb stratum of skunk cabbage, Canada bunch berry, five-leaf bramble, and sphagnum moss. Soil is typically organic muck, saturated to the surface.

A functional analysis, performed using the WET II method calibrated for Southeast Alaska (Adamus Resource Assessment, 1988), of forested wetlands along the proposed access road shows high ratings for "disturbance of sensitive wildlife" and "ecological replacement cost". Other wetland functions were rated moderate or low (See Chapter 3, Wetlands for a discussion of the functional analysis). Should these wetlands be located within the Juneau Wetland Management Program (JWMP) area, they would most likely be rated Class C, available for permitting of wetland fills by the CBJ Wetland Review Board (JWMP, 1991). The two functions with high ratings for these forested wetlands are not unique to wetlands. The "disturbance of sensitive wildlife" rating is a result of the geographic position of the wetland ... the adjacent uplands are as important to the disturbance sensitive wildlife as the wetlands.

Similarly, the rating for "ecological replacement cost" is a function of the size of trees in the forested wetland and the length of time it would take to replace them, an attribute equally shared by adjacent upland forest. These wetlands would be considered of low value overall as compared to other wetland types found in Southeast Alaska (Dunn Environmental Services, 1997b). The wetland functions of groundwater recharge and groundwater discharge are of interest because changes to these functions can potentially affect wetland habitats down slope. Forested wetlands along the proposed road alignment are typically underlain by impermeable soils, obviating groundwater recharge or discharge. On steeper side slopes, some lateral discharge of water probably occurs below the root layer but on top of the soil.

Given the factors of cost, logistics, and overall project need, wetlands along the proposed alignment cannot reasonably be avoided. Wetlands along the alignment typically stretch from the toe of very steep terrain up slope of the alignment to very near the beach cliff. An alignment to avoid wetlands would have to traverse either the steep terrain up slope of the alignment, or be aligned right along the top of the first bench or cliff inside the shoreline (see Alternative A, above).

The access road would be constructed to a 35 mph design speed and vertical alignment initially, in order to economize and lower the quantities of fill needed for construction. The alignment would conform to a horizontal configuration consistent with a 50 mph design so that the road could be upgraded, if necessary, with no re-alignment. This scenario would minimize the fill of wetlands by lowering the extent of cuts and fills initially. Should the road never need to be upgraded, fill of some wetlands would be avoided. Best Management Practices such as end-dump construction in and hand clearing of wetlands would also be used to minimize impacts by eliminating mechanized vehicle operation in wetlands.

A Storm Water Runoff Analysis has been prepared as a guide in mitigation of potential storm water runoff impacts and to serve as a template for the Erosion and Pollution Control Plan to be included in construction documents (Easton, 1996). The analysis includes mitigation measures to minimize erosion and sedimentation potential during construction as well as operation of the proposed facilities.

Proposed mitigation measures are listed in Chapter 2, Alternatives.

Construction of the road would likely lead to some level of development on private land at Cascade Point. The effects to wetlands from this development would be considered indirect since the development would not occur within the road corridor and the majority of the development would not occur until the road had been built.

The proposed development at Cascade Point (private access road, staging area, and log and equipment transfer bulkhead) would result in the filling of approximately 2.5 acres of forested wetlands and 0.2 acres of scrub shrub/emergent wetlands along the beach. Reasonably foreseeable development at Cascade Point (gas station/convenience store, fast ferry dock, and electrical generator building) would result in the filling of approximately an additional five acres of forested wetlands.

The functional analysis of the estuarine wetland on the beach at Cascade Point showed high ratings for the functions of "ground water discharge" and "regional ecological diversity". Other wetland functions were rated moderate or low. Definitions of high rated functions are discussed in Chapter 3, Affected Environment.

Initial developments at the Cascade Point site are planned to be incorporated into the reasonably foreseeable design with no change in footprint. The log and equipment staging area would eventually be a parking lot and vegetated open area for the development, while the location of the equipment and log transfer bulkhead would allow incorporation of the fill within the footprint of the proposed reasonably foreseeable dock facility.

Alternative C

Alternative C is physically similar to Alternative B, the Proposed Action, and would have the same wetland impacts on National Forest System land.

SUBSISTENCE

Subsistence is the traditional and customary use of fish and game and other renewable natural resources by rural Alaska residents. Residents of the CBJ are classified as non-rural and do not qualify as subsistence users.

The project area is far from communities that are classified as rural. It is not likely that people from rural communities participate in subsistence activities in the project area.

However, Goldbelt, Inc. shareholders use the area for berry harvesting, and many Juneau residents dig clams on the beaches and participate in other personal use activities in the area. All of the alternatives would likely result in an increase in personal use activities in the Berners Bay area. Over time, this increased use may result in reduced success rates for harvesting some species due to increased competition and reduction in plant and animal densities.

CULTURAL RESOURCES

Impacts to cultural resources can be classified as direct and indirect, although the former is much easier to define than the latter. Impacts can occur due to project related activities, increased public access, or from natural erosional processes. Impacts resulting from project activities could include total destruction or partial damage due to ground disturbing actions, increased pedestrian or vehicular traffic over a site, souvenir hunting or actual looting. Natural processes, such as erosion and sedimentation, can adversely affect sites. These processes could be exacerbated by project activities. Virtually all impacts to archaeological or historic sites are permanent and irreversible.

The area of potential effect (APE) as defined in 36 CFR 800.2 (c) is the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties if any properties exist. Historic property, for this definition, is the equivalent to cultural sites, either historic or prehistoric. Generally the APE is considered to be the boundaries of the project area. It is extremely difficult to predict indirect impacts or effects which may result from a project activity outside the boundaries of the APE. Post-project monitoring is the best measure available to ensure that historic properties are not being impacted. Clearly, the closer a cultural site is to a project area the greater the likelihood that there may be human-caused impacts to that site.

The archaeological survey along the proposed access road alignment and the Cascade Point development area found a large number of culturally modifies trees

(CMTs) and a small historic or prehistoric temporary campsite on Goldbelt, Inc. private land, JUN 710 (Yarborough, 1997). The small campsite and a grove of CMTs in the vicinity of the campsite have been determined eligible for listing on the National Register of Historic Places as a site that may yield information important in prehistory or history.

Although small, the site has the potential to provide information relevant to cultural chronology, settlement patterns, and subsistence systems. Research at this site could add to an understanding of the cultural chronology of the project area, the range of site types around Lynn Canal, and the relationship between environmental characteristics and settlement patterns.

Six sites were found outside the APE. The construction of the road would provide closer foot access to Sawmill Creek; however, it would still be approximately 1.25 miles from the end of the road to Sawmill Creek. Given the distance from the end of the road to these sites, it is anticipated that there would be no effect on these sites under any of the alternatives. Of the two sites in Echo Cove, one has been previously determined Not Eligible for listing on the National Register; therefore, effects are not measured against this site. The other site, an historic trail, has been heavily impacted by road construction in the past. The construction of the proposed access road would not impact this trail any more than has been previously impacted in the past by the original road construction.

Table 4-1 identifies the anticipated effects which the proposed access road would have on historic properties.

Table 4-1
Anticipated Effects of the Proposed Access Road on Historic Properties

Site	Location	Eligibility	Effect
JUN 234	Echo Cove	Unknown	No
JUN 672	Echo Cove	No	~
JUN 673	Sawmill Creek	Yes	No
JUN 674	Sawmill Creek	Yes	No
JUN 675	Sawmill Creek	Yes	No
JUN 676	Sawmill Creek	Yes	No
JUN 710	Cascade Point	Yes	Yes

Alternative A, No Action

Selection of the No Action Alternative would not allow construction of the road as described in the Proposed Action. This would eliminate any direct effects on cultural resources due to road construction and use. Assuming some development does

occur at Cascade Point without the construction of the road, the No Action Alternative would have effects on cultural resources similar to the Proposed Action. Should a dock facility be constructed at Cascade Point, a Determination of Effect for the campsite discussed above would be necessary. A Determination of Effect is a document detailing the potential effect of a proposal on cultural resource. The Determination of Effect is coordinated with the land owner and approved by the State Historic Preservation Officer.

Alternative B, Proposed Action

There is a reported shaman burial located within the proposed access road alignment by an individual. However, this information has not been substantiated through discussions with other Juneau area Native Elders.

Protection of cultural resources is a high priority for the National Forest. In order to ensure that any existing, unidentified cultural resources are not inadvertently impacted, a qualified archaeologist would be on the ground during all ground disturbing activities. Should an historic property be uncovered during the road construction, all work in this area would stop and appropriate people would be notified. A mitigation plan would be developed and carried out in this area before any road construction work could resume.

The development on private land at Cascade Point would have an impact on JUN 710 site. That portion of the site which consists of a shell midden and associated depressions would not be directly impacted by the development. The portion of the site which consists of the large cluster of CMTs however, would be directly affected..

A Determination of Effect for JUN 710 is being sought from the State Historic Preservation Office. The Criteria of Effect (36 CFR 800.9(b)) have been applied; although the effects of this undertaking would otherwise be adverse, they can be considered as not being adverse when:

The historic property is of value only for its potential contribution to archaeological, historical or architectural research, and when such value can be substantially preserved through the conduct of appropriate research (36 CFR 800.9(c)(1)).

Proposed mitigation for impacts to cultural resources is described below (Goade, 1997):

- Goldbelt, Inc. has committed to carrying out chronological research on the site, including dating of carbon-based material from the camp site and dating of tree sections from the CMTs.
- The campsite would be avoided with proposed development.
- CMTs would be mapped and documented before clearing activities.
- An interpretive display in the proposed lodge would explain the significance of historic or prehistoric cultural resources in the area.

Alternative C

This alternative is physically similar to the Proposed Action. Effects on cultural resources and proposed mitigation measures would be the same as the proposed action, described above.

Cumulative Effects

Cumulative impacts are defined as: "... the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (CEQ, 1986).

This section discusses the cumulative effects associated with the Cascade Point access road. Other existing, proposed and potential projects in the vicinity of the Echo Cove and Berners Bay vicinity include: Cascade Point development by Goldbelt, Inc., the Juneau Access Improvements, Kensington Gold Project, Lace River Hydroelectric, Jualin Mine Project, Goldbelt, Inc./Forest Service land exchange, Echo Ranch Bible Camp, and Point Bridget State Park.

Analysis of cumulative impacts uses the existing proposals for each of the reasonable potential developments. Alternative B, the Proposed Action of this Final EIS, was used in this analysis. Alternative 2, the East Lynn Canal Road, was used to represent the Juneau Access Improvements Draft EIS. The Forest Service selected alternative, as presented in the Kensington Gold Project Record of Decision, 1997, was used for that analysis. The preliminary permit application for the Lace River Hydroelectric project was used for information on that proposal. Information on the Jualin Exploration was obtained from various exploration permit applications and environmental documents.

Much of the comment received during scoping focused on the impacts of the proposed development at Cascade Point, which is not within the jurisdiction of the Forest Service. The significant issues described in Chapter 1 and the discussion of their effects presented in this chapter are also relevant for examination of the cumulative impacts of the reasonably foreseeable development at Cascade Point also.

Description of Other Projects

Cascade Point Development by Goldbelt, Inc. This proposal is also discussed in Chapter 1 of this document. As stated in the Echo Cove Master Plan (MRV, 1996) the proposed Phase One of development at Cascade Point includes initial dock development including a log transfer facility and construction of the access road. Development of other facilities at Cascade Point would proceed as dictated by market conditions and acquiring needed permits, but is anticipated to begin soon after construction of the access road. Planned public facilities, as discussed in the Echo Cove Master Plan second phase of proposed development, consist of a lodge, high speed ferry facility, commercial fishery support, small grocery store, service station, maintenance garage, and small utilities building.

For the purpose of this cumulative effects discussion, activities identified in the Echo Cove Master Plan as the proposed Phase One, and the proposed second phase developments considered above will be assumed to be developed. The master plan discusses development of at least some of these activities in the next several years. Other activities discussed in the master plan, such as housing for Jualin Gold Mine workers, construction of a campground, and construction of a culture camp, depend upon the nature of economic opportunities available and permitting, which has not yet been applied for.

In response to comment received on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent if the No Action Alternative were selected. Goldbelt, Inc. has verified that they would pursue construction of a road on private land and state tidelands under Alternative A - No Action.

Juneau Access Improvements The Alaska Department of Transportation, in cooperation with the Federal Highway Administration, has released the Juneau Access Improvement Draft EIS. The comment period on the Draft EIS has closed, and the Final EIS has not been released.

This document assesses the potential impacts associated with improving access to Juneau. The proposed action is a 65-mile, 2 lane highway on the east side of Lynn Canal from Echo Cove to Skagway, with ferry transport from Skagway to Haines. The Draft EIS indicates that road construction could begin as early as the year 2000 and be completed by the year 2005.

As described in Chapter 1, Background, in Echo Cove the proposed Juneau Access Improvements Alternative 2 would follow the same alignment as the proposed Cascade Point access road alignment. From Echo Cove, the highway, under this alternative, would follow the shore around Berners Bay. The road would cross the head of Berners Bay using a causeway and two bridges. North of Berners Bay, the highway would follow the Lynn Canal coastline to Skagway. The Draft EIS also considers a high-speed ferry alternative with four options. Two options would replace the existing ferry service with all high-speed ferries. Two of these options also include extending North Glacier Highway eight miles beyond Echo Cove to a new ferry terminal.

For the proposed action, the Draft EIS projects daily traffic averages of 618 cars through the year 2005 and 1,429 cars between the years 2005 and 2025. Traffic is expected to be highest during the summer months.

Kensington Gold Project The USDA Forest Service has published a Record of Decision documenting the selection of the alternative that will be used to revise the 1992 Plan of Operations for the Kensington Gold Project. The decision was based upon analysis and evaluations in the Final Supplemental Environmental Impact Statement published in August, 1997. Four alternatives, including the No Action Alternative, and the Proposed Action were considered. The selected alternative, Alternative D, changes methods of tailings management and stream crossings from those proposed.

The 1997 Proposed Action differs from the 1992 plan of operations in the following facets of operations:

- Ore Processing
- Waste Rock
- Tailings Management
- Diversions
- Mine Drainage and Mill Effluent
- Stream Crossings
- Power Supply
- Employee Housing
- Borrow Area
- Reclamation

The selected alternative differed from the other alternatives in that it requires an engineered structural berm around three sides of the dry tailings facility, the tailings slurry is piped, rather than trucked, to the dry tailings facility from the mill, and bridges rather than bottomless arch conduits, are used for crossing Upper Sherman Creek and Ivanhoe Creek. There will likely be increased boat and aircraft activity to support mine and camp operations.

Lace River Hydroelectric The Lace River Hydroelectric project as proposed would have been located 5.5 miles up the Lace River on an unnamed Lace River tributary. Lace River is located at the head of Bemers Bay.

However, on October 24, 1997, Lace River Hydro notified the U.S. Federal Energy Regulatory Commission (FERC) that they were relinquishing their permit because they had no market for their power (Lace River Hydro, 1997). The Lace River Hydroelectric Project had been in the proposal phase with feasibility studies still pending. FERC issued a preliminary permit on December 11, 1995, which would have been valid for three years or until the project's development application was filed.

It is unlikely that the project would be developed in the reasonably foreseeable future. At some future date, however, Coeur Alaska could decide to buy power from Lace River Hydroelectric. In that case, the specifics of the project, such as effects on visuals and water quality, would undergo public review through the NEPA and FERC licensing processes. It is assumed that the project design would be similar to the proposal previously submitted to FERC. The Lace River Hydroelectric Project is located approximately two miles from the proposed access road area.

Jualin Mine Project The Jualin Mine property is located in the Bemers Bay Mining District near the north end of the Juneau Gold Belt, across from Echo Cove. Gold was discovered at Jualin in 1895; production commenced in 1896. Operation of the mine was intermittent until 1920. The historic Bemers Bay District recorded production of 61,100 ounces of gold between 1885 and 1920. About 136,000 tons

were mined.

Jualin became active again in 1978 when Hyak Mining Company of Juneau restaked the core of the property. A succession of companies, including Hyak, Bear Creek Mining Company, International Curator Resources (Curator), and Placer Dome U.S., Incorporated, conducted exploration activities at Jualin between 1978 and 1992. Curator also constructed a road from Slate Creek Cove to the portal.

In June 1993, Coeur Alaska entered into a joint venture with Curator. This joint venture conducted limited exploration that year. Coeur Alaska acquired 100-percent interest in the property from Curator during 1994 and conducted additional, limited exploratory drilling. No exploration has occurred at the site since 1994.

In general, the estimated mineral resource is approximately one million tons, containing an estimated 200,000 to 400,000 ounces of gold. Additional drilling, underground development sampling, resource modeling, mine planning, and engineering economics would be necessary to demonstrate that the project could be economically viable. In addition, significant environmental baseline studies have not been completed, and a Plan of Operations has not been developed for mining.

The Jualin Mine remains an exploration project. While exploration activities are scheduled to continue, the operator does not currently have plans to develop the Jualin Mine.

Goldbelt, Inc./Forest Service Land Exchange On December 19, 1995, Goldbelt, Inc. and the Forest Service signed an "Agreement to Initiate" agreeing to evaluate an exchange of real property. National Forest System lands described in this agreement that might be involved in the evaluation, include parcels in the Echo Cove area and in the Laura's Creek area near Hobart Bay. Goldbelt, Inc. will seek to acquire private inholdings within Admiralty Island National Monument or other Conservation System Units on the Tongass National Forest to exchange for National Forest System land. In land exchanges, the Forest Service is required to trade lands of equal value. National Environmental Policy Act (NEPA) analysis will be completed before a decision is made to exchange lands. Environmental analysis has not yet begun since the specific parcels of land involved have not been determined.

Echo Ranch Bible Camp The Echo Ranch Bible Camp is located on private land west of the mouth of Echo Cove and is in operation from late April through September depending on access to Echo Cove. Access to the camp is by wheeled vehicles or foot traffic on the beach from Echo Cove, or by landing craft from the launch ramp at Echo Cove. The Bible Camp and Cascade point are intervisible.

Point Bridget State Park This state park is located to the west of the Echo Ranch Bible Camp, at the mouth of Berners Bay. The park contains two public rental cabins, located near the shore of Berners Bay, and a system of improved trails to access the cabins from North Glacier Highway. The cabins are located approximately two miles west of Cascade Point.

Wildlife

Wildlife cumulative impacts were modeled using the same criteria as those used for the access road. Assumed impacts for a community of 11 to 500 persons, or in the

case of black bears, for a permanent camp site were used for analysis of the proposed Cascade Point development. The impact areas for the Cascade Point development overlapped the impact areas for the access road, resulting in cumulative totals that are less than the arithmetic addition of the two totals considered separately (Dunn Environmental Services, 1997c).

Reductions in habitat capability are calculated using three types of impacts: permanent loss of habitat resulting from land alterations; permanent displacement of animals from the vicinity of developed areas; and temporary disturbance of animals. Such factors as hunting, trapping, road kills, human/animal encounters, and noise are included in the reduction factors.

All of the above listed activities could contribute to wildlife impacts in Bemers Bay. Many of the impact areas physically overlap, including Point Bridget State Park facilities, North Glacier Highway, Echo Ranch Bible Camp, CBJ Echo Cove campground and launch ramp, land exchange parcels, the Proposed Action, Juneau Access Improvements, and the proposed Cascade Point development on the south side of Bemers Bay. The Juneau Access Improvements Alternative 2 (East Lynn Canal Road) would also have overlapping wildlife impact areas with the other listed cumulative actions in Bemers Bay.

Brown bear impacts are based on habitat capability reduction factors of 60% within a one mile radius, and 30% within an area of one to five miles of an arterial road. Reduction factors of 70% within the one mile radius, and 40% within the area of one to five miles are used for developments such as the proposed Cascade Point development. High reduction factors for brown bear are due partly to the high disturbance factor experienced in brown bear/human encounters.

Black bear and mountain goat habitat capability reduction factors are 20% within two miles of an arterial road and 40% within one mile of a permanent camp such as the proposed Cascade Point development.

Marten habitat capability reduction factor is 80% within two miles of either an arterial road or a permanent development. This high reduction factor is due to the range of martens in the winter, combined with the high probability of their being trapped.

Information in the following table (Table 4-2) is taken from the Juneau Access Improvements Draft EIS, the Kensington Gold Project Final EIS, and the technical reports prepared for those documents to derive estimates of reduction percentages for the Jualin Mine. The other previously existing components of cumulative effect listed above are included in the existing habitat capability models, and therefore, cannot be readily factored into the total impact.

Percentage of habitat capability reductions expressed in the table are for the total of five Wildlife Analysis Areas (WAA's) surrounding Bemers Bay, that would have one or more of the proposed or existing actions located within them. Figure 4-3, Wildlife Analysis Areas Surrounding Bemers Bay, shows the relationship of the actions considered in this cumulative analysis and the impacted WAA's.

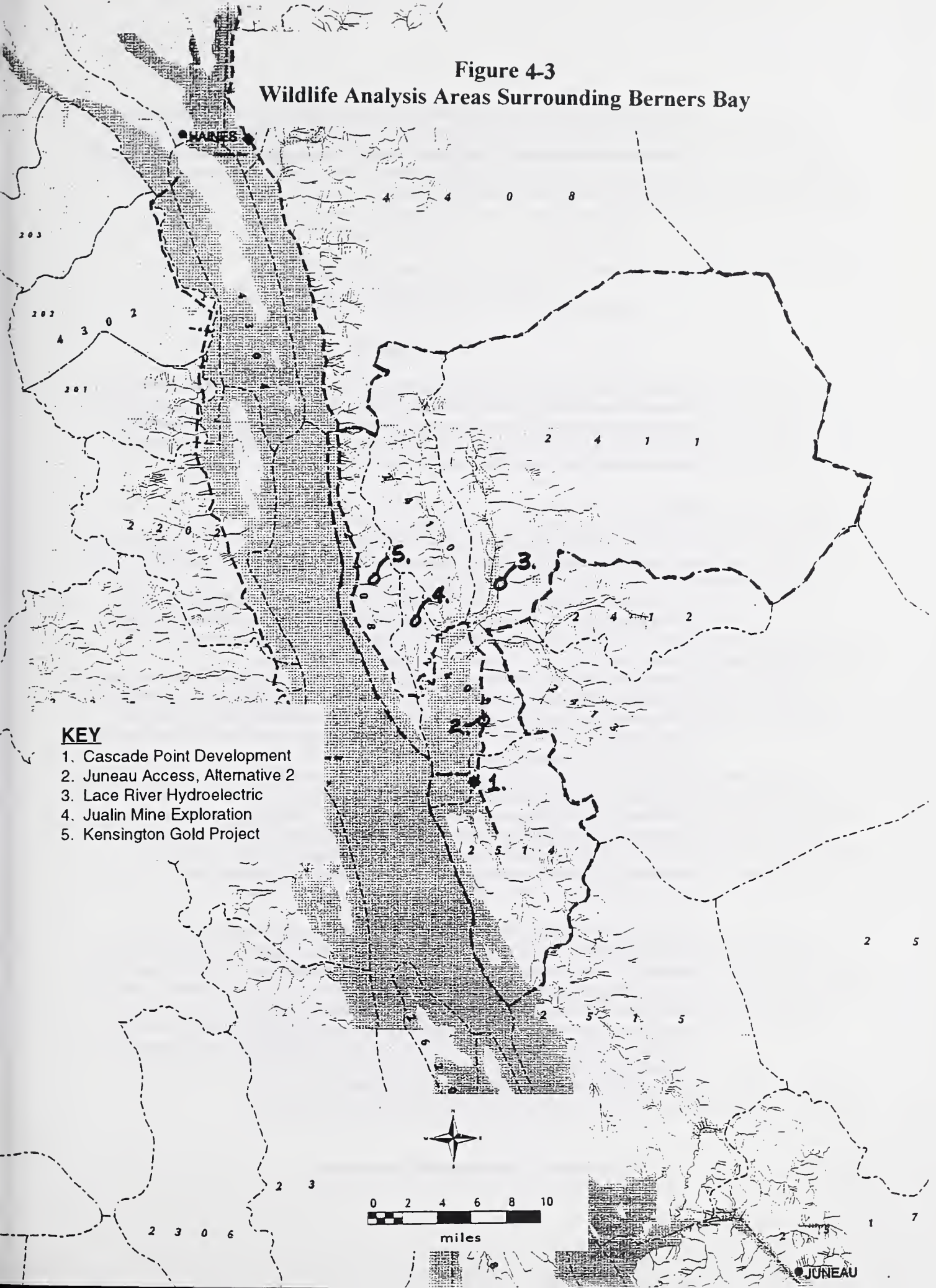
Table 4-2
Cumulative Habitat Capability Percentage Reductions
For Management Indicator Species (for Wildlife Analysis Areas Surrounding
Berners Bay, WAAs 2408, 2409, 2410, 2411, and 2514)

Action	Brown Bear	Black Bear	Mountain Goat	Marten
Proposed Access Road WAA 2514	1%	<1%	<1%	1%
Cascade Point Development WAA 2514	3%*	<1%*	<1%*	6%*
Juneau Access Improvements, Alternative 2 WAA's 2408, 2409, 2410, 2411, and 2514	31%*	7%*	1%*	35%*
Kensington Gold Project WAA 2408	3%**	3%**	2%**	6%**
Jualin Mine Exploration WAA 2409	4%**	1%**	<1%**	7%**
TOTALS	42%	<13%	<6%	55%

* These percentages have been reduced to account for overlap of impact areas with the Cascade Point access road impact areas.

** These percentages have been calculated using project descriptions upon which to base habitat reduction factors. Some percentages may be high, depending upon actual operations conditions.

Figure 4-3
Wildlife Analysis Areas Surrounding Berners Bay



As shown in Table 4-2, the proposed Cascade Point access road would have low habitat capability reductions (less than 1%) for the Management Indicator Species. While only the Kensington Gold Project has reached a formal decision stage, should all projects be implemented, wildlife impacts in Berners Bay may reach the following percentages of habitat capability reduction:

- Brown bears 42% reduction
- Black bears less than 13% reduction
- Mountain goats less than 6% reduction
- Marten 55% reduction

While these reductions in habitat capability cannot be directly related to reductions of animals without exhaustive population studies, it is clear that the cumulative habitat capability reductions of brown bear, black bear, and marten have the potential to significantly impact those species in the Berners Bay area. Such an impact could lead to restrictions on hunting or trapping of the species.

Fish

The proposed Cascade Point road would have no direct effects on fish, and minimal construction related water quality effects downstream of the road (see Fish, p. 4-3).

Of the other proposed actions in Berners Bay, only the proposed Cascade Point development and the proposed Juneau Access Improvements Alternative 2 (or 4) would contribute cumulatively to the fish impacts of the proposed access road.

The Cascade Point development site contains two very small intermittent streams that flow into beach gravels before reaching tidewater. Cascade Creek would be crossed by the portion of proposed access road to be constructed on Goldbelt, Inc. land. Cascade Creek is assumed to contain resident populations of Dolly Varden char and cutthroat trout upstream of the proposed crossing site.

The proposed crossing site on Cascade Creek is at a very high gradient stretch of the creek, at a rock gorge approximately 20 feet deep. The crossing would be accomplished with a bridge that spanned the entire creek. No impacts to resident fish, or water quality impacts downstream of the Cascade Creek crossing are anticipated. Short-term construction related water quality impacts may occur on the two small intermittent streams at the Cascade Point development site.

The log and equipment transfer bulkhead proposed for the beach just south of Cascade Point would be constructed of shot rock behind a log bulkhead, effectively covering all intertidal and benthic organisms beneath the fill. Short-term water quality impacts of turbidity could be expected during construction. The bulkhead would be constructed immediately to the south of an intertidal rock outcrop of approximately 150 square feet that is covered with kelp similar to the kelp used by Pacific herring for spawning activities along the shore to the north. The bulkhead would presumably not impact future spawning activities of Pacific herring, but would cover potential rock substrate that could be used for herring spawning.

The Juneau Access Improvements Alternative 2 would require widening and regrading of the proposed Cascade Point Access roadbed (the Juneau Access Alternative 4 alignment would be physically identical to Alternative B in the Cascade Point Access Road EIS alignment). Widening and regrading of the roadbed would involve extension of culverts which could cause short-term, construction related water quality impacts downstream similar to those possible from the original construction of the proposed access road.

The cumulative effect of these activities would probably be within the normal range of water quality changes in the project area.

Recreational Activities

Impacts to recreational activities resulting from the proposed Cascade Point access road were analyzed by splitting the issue into three factors: visual, noise, and increased use of recreational resources. A summary of the analysis on pages 4-5 and 4-6 shows expected visual and noise impacts of the proposed access road to be consistent with Forest Service objectives and guidelines for visual quality and noise.

Projects that in conjunction with the Cascade Point development could contribute to cumulative effects to recreation by increased use of recreational resources in Berners Bay are the reasonably foreseeable actions at Cascade Point, Juneau Access Improvements Alternatives 2 or 4, Jualin Mine Exploration, Lace River Hydroelectric project, and Echo Ranch Bible Camp. The Kensington Gold Project is outside of Berners Bay, and beyond the commonly used Berners Bay recreation area.

The reasonably foreseeable actions at Cascade Point could potentially consist of a tourism lodge, utilities, a gas station, and a convenience store. These facilities would both increase the number of people living at the site plus the number of people visiting the area and recreating there. There could also be an impact to boaters and kayakers in Berners Bay from increased ferry, barge, and boat traffic. This activity would increase noise levels and visual effects.

The Juneau Access Improvements, Alternative 2, would also increase access through the Goldbelt property and around the mouth of Berners Bay all the way to Skagway. This would greatly increase the recreational impacts to Berners Bay from the increased number of people passing through and those traveling to Berners Bay specifically to recreate because of additional access. Construction of the road would affect visual quality in the road corridor. Increased vehicle traffic would increase noise levels.

If the Jualin Mine were approved, the cumulative impacts to recreation with the Cascade Point development would be from increased traffic to the mine site from workers traveling, possibly by ferry from Cascade Point. Boaters and kayakers would most likely see more boat traffic across Berners Bay. If miners were to be housed at Cascade Point, there would be an impact from more people living at the site and recreating in the area. Noise and visual impacts would also increase from these activities.

Both Echo Ranch Bible Camp and Bridget State Park are existing facilities. Bridget Cove State Park is located away from Cascade Point should only experience visual

cumulative effects associated with development there. Travelers to Echo Ranch Bible Camp walking or driving to the camp via the beach at Echo Cove may encounter or see more people due to the Cascade Point development but this would be only as they passed through the Echo Cove Area. People who work and recreate at the Echo Ranch Bible Camp would also have a view of the development at Cascade Point (see this chapter, Visuals). An improved road to Echo Cove or a winter maintained road could increase Echo Ranch Bible Camp's season beyond the current April-September season.

If a land exchange took place between Goldbelt, Inc. And the Forest Service including land in Echo Cove, land could pass into private ownership and may not be open for public access. Goldbelt, Inc. would own the land on both sides of the proposed access road and an additional parcel north of Cascade Point. Additional land in Echo Cove would provide increased development opportunities for Goldbelt, Inc. as discussed in the Echo Cove Master Plan.

The cumulative effects of all these proposed activities would increase boat and aircraft traffic and recreational use which would increase noise, visual and recreation use impacts. Increased recreational activities impacts would include possible increase of commercial and personal tourism.

Visual

A visual analysis of reasonably foreseeable development proposed at Cascade Point was done, viewing the activities from two popular viewpoints: on the water inside Echo Cove, and on the beach at Point Bridget State Park (Dunn Environmental Services, 1996c). The visual analysis used the technique of comparing existing views with a rendering of the proposed development. Photographs 4-1 and 4-2 show the existing views from the two viewpoints. The renderings following each photograph show the proposed developments from each of the viewpoints (Figure 4-1, Proposed Cascade Point Development from Viewpoint 1, and Figure 4-2, Proposed Cascade Point Development from Viewpoint 2). In this case, the development would be on private Goldbelt, Inc. land and State of Alaska tidelands, and, therefore, not subject to Forest Service Visual Quality Objectives for the area. However, because viewers of the area expect a quality experience, and because the issue was important during scoping, the views are analyzed using standard analysis methods.

From both viewpoints, the proposed dock facility would result in a strong contrast with the surrounding shoreline, while the lodge and other proposed upland facilities would blend well with the surrounding landscape. From both viewpoints, the proposed Cascade Point facility would probably result in a moderate adverse visual impact. In contrast, the proposed facility at Cascade Point would include a public viewpoint that would provide an excellent view of Bemers Bay, Lynn Canal, and the Chilkat Mountain Range.

The Juneau Access Improvements, Alternative 2, would be visible in Bemers Bay where it crosses the head of the bay with a causeway and two bridges. The VQO for the Congressionally designated LUD II area is Retention (USDA Forest Service, 1997).

Measures to mitigate visual impacts at Cascade Point outlined in the Echo Cove Master Plan include the following:

- Incorporation of existing native vegetation visual buffers around planned upland developments, such as the lodge building.
- Use of natural colors and subdued tones for proposed facilities.
- Construction of a public viewpoint at Cascade Point.

All of these projects fall in Land Use Designations with a VQO of Retention. To meet full Retention, management activities should not be evident to the casual Forest visitor. Exceptions to this VQO can be made for small non-conforming developments or transportation systems. A road corridor has been identified in TLRMP (USDA Forest Service, 1997) as a valid transportation corridor for the Juneau Access Improvements Draft EIS. All of these projects would likely increase the visual impact to visitors when viewed from a distance. It is anticipated that these projects would meet the visual standards and guidelines of TLRMP (USDA Forest Service, 1997)..

Noise

This noise analysis includes reasonably foreseeable activities at the proposed Cascade Point development site, including a fast ferry facility, lodge, commercial fishing support, and a gas station/convenience store.

The analysis assumes compliance with the CBJ noise policy (CBJ, 1996) at the proposed Cascade Point development site, as well as a traffic level on the proposed access road similar to the traffic predicted for the Juneau Access Improvements, Alternative 4 that would feature a fast ferry operation out of Bemers Bay. The CBJ noise ordinance requires a steady state noise level no higher than 65 dBA daytime, and 55 dBA nighttime at the property line. This steady state noise level would include generator noise as well as vehicle noise averaged hourly. The noise analysis showed no detectable increase in sound levels at either Point Bridget State Park or Sawmill Creek. Those traveling near shore of the proposed Cascade Point development in non-motorized vessels would undoubtedly notice an increase in noise levels (Dunn Environmental Services, 1996a).

Wetlands

The proposed Cascade Point access road would result in filling of approximately seven acres of forested wetland. These forested wetlands are rated high for the functions of "disturbance sensitive wildlife" and "ecological replacement cost".

The proposed development at Cascade Point (private access road, staging area, and log and equipment transfer bulkhead) would result in the filling of approximately 2.5 acres of forested wetlands and 0.2 acres of scrub shrub/emergent wetlands along the beach. Reasonably foreseeable development at Cascade Point (gas station/convenience store, fast ferry dock, and electrical generator building) would result in the filling of approximately an additional five acres of forested wetlands.

The functional analysis of the estuarine wetland on the beach at Cascade Point showed high ratings for the functions of "ground water discharge" and "regional

ecological diversity". Other wetland functions were rated moderate or low. Definitions of high rated functions are discussed in Chapter 3, Affected Environment.

Initial developments at the Cascade Point site are planned to be incorporated into the reasonably foreseeable design with no change in footprint. The log and equipment staging area would eventually be a parking lot and vegetated open area for the development, while the location of the equipment and log transfer bulkhead would allow incorporation of the fill within the footprint of the proposed reasonably foreseeable dock facility.

Implementation of Juneau Access Improvements, Alternatives 2 or 4, would necessitate widening of the Cascade Point access road, with a probable increase in wetland fill of one to two acres. Alternative 2, the East Lynn Canal road, would fill 137 acres of wetlands with a functional value of moderate to high. Much of the wetland fill necessary for Alternative 2 would take place in Bemers Bay, both in intertidal areas at the head of the bay, and in forested areas on the north side of the bay.

Although outside the Bemers Bay watershed, the Kensington Gold Project FSEIS identifies the long-term disturbance of 164 acres of wetlands as a result of Alternative D, the Forest Service selected alternative.

No wetland impact figures are available for the Jualin Mine Exploration. Other proposals in Bemers Bay are not likely to have substantial wetland impacts.

Although the Kensington Gold Project is the only proposal to have received final approval, should all proposals for activities in Bemers Bay be approved, the cumulative wetland fill would be approximately 299 acres. Most of this wetland impact would be the result of the Kensington Gold Project and the Juneau Access Improvements, Alternative 2.

Subsistence

The proposed action would have no effect on subsistence (see earlier in this chapter, Subsistence). Therefore, no cumulative effect is anticipated.

Cultural Resources

Proposed future developments within the Bemers Bay area need to be considered each on their own merit to ensure that no immediate impact would occur to any cultural resources. During the environmental analysis document preparation, the cultural resources in each separate project area would be considered and the effect the project may have in turn on each cultural site, if any. This meets the direction of the National Historic Preservation Act (NHPA).

Cumulative effects on cultural resources could occur through natural erosion and weathering and from continued development on land containing the cultural sites.

The project area encompasses territory traditionally used by the Auk Tlingit. While project activity cannot have an effect on past historic events, continued federal management activities can have a long range effect on places of importance to the Tlingit. The Forest Service seeks to participate in partnerships to promote awareness and interpretation of the local heritage.

Since the early 1980s, the Chatham Area of the Tongass National Forest has consistently implemented the inventory, evaluation, and assessment of effects through the Section 106 process of the National Historic Preservation Act. If historic sites identified are avoided and/or protected using appropriate mitigation measures, there should be no additional cumulative effects to these sites.

**EFFECTS OF
SHORT-TERM
USES ON LONG-
TERM
PRODUCTIVITY**

Section 102 of NEPA requires that EIS's include "the environmental impacts of alternatives including...the relationship between short-term uses of man's environment and the maintenance of long-term productivity." Under Alternatives B and C, the long-term productivity of the road corridor would be lost during the life of the road. If Goldbelt, Inc.'s facilities were abandoned, the road would be restored to pre-construction conditions and productivity. Surface water hydrology and aquatic habitat, as well as wildlife habitat, would be established after closure. Under all alternatives, there would be some wetland loss.

**IRREVERSIBLE
AND
IRRETRIEVABLE
COMMITMENT
OF RESOURCES**

An irreversible commitment of resources is defined as the loss of future options. It applies primarily to non-renewable resources, such as minerals or cultural resources, and to those factors which are renewable only over long time spans, such as soil productivity.

Irretrievable commitments represent the loss of production, harvest or use of renewable resources. These opportunities are foregone for the period of the proposed action, during which other resource utilization cannot be realized. These decisions are reversible, but the utilization opportunities foregone are irretrievable.

The proposed action would result in the irretrievable loss of approximately 21 acres of forest and soil from construction of the access road as well as approximately 7 acres of forested wetlands.

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Chapter 5

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List of Preparers

Introduction

The EIS for the Cascade Point Access Road and Development was prepared by Dunn Environmental Services as a third-party contractor for the Forest Service. Dunn Environmental Services has responsibility for completion of the document under the direction of the Forest Service and has used several subcontractors in the preparation of this EIS. The Forest Service was responsible for review and acceptance of the EIS. The following are lists of individuals on the Forest Service interdisciplinary team and Dunn Environmental Services interdisciplinary team who were directly involved in the effort.

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Chapter 6

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CHAPTER 7

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APPENDIX A

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15. Larry Musarra
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23. Malcolm A. Menzies, R&M Engineering
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25. Paul Voelckers, MRV Architects
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29. Steven T. Zimmerman, National Marine Fisheries Service
30. Mark and Patti Rorick, Sierra Club Alaska Chapter
31. Donn Liston
32. Scott V. Spickler
33. Les V. Spickler
34. Peter Jon Gillquist
35. Mark Rorick
36. Betty and Matt Seguin and Sarah Asper-Smith
37. Anissa Berry-Frick
38. L. Dale Reid, International Union of Operating Engineers
39. Michael J. Notar, International Brotherhood of Electrical Workers
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41. Don Etheridge, Alaska State District Council of Laborers
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64. Peggy Wilcox, Southeast Alaska Conservation Council
65. Patrick Wonser
66. Bruce Abel, Juneau Chamber of Commerce
67. Kathy Molly
68. Paul M. Richards
69. Randy Wanamaker, Gateway Technologies
70. Robert W. Loescher, Sealaska
71. Anthony Williams
72. Kerri Tonkin
73. Nevin Holmberg, U.S. Fish and Wildlife Service
74. Clayton Hawkes, Alaska Department of Fish and Game
75. Charles Northrip, Juneau Economic Development Council
76. Chris Kent, Juneau Audubon Society
77. Ed Grossman, Fish Tale Alaska Wilderness Adventures
78. Pamela La Bolle, State Chamber of Commerce
79. William A. Corbus, Alaska Electric Light and Power Company
80. Aaron Brakel
81. Dennis L. DeWitt
82. David Harvey
83. William W. Garry; Department of Natural Resources, Division of Parks and Outdoor Recreation
84. Richard B. Parkin, Environmental Protection Agency
85. Kathy Stepien
86. Dana Owen, Friends of Berners Bay
87. John A. Sandor
88. Richard and Sylvia Gard
89. Patty Ann Polley
90. Jennifer Black
91. Karen K. Doxey
92. William G. Brock
93. Dale Henkins
94. Tim Moore
95. Fred Morino
96. Daren Case
97. Bruce Abel, Juneau Chamber of Commerce

JUNEAU, AK
DECEMBER 26, 1997

RESPONSES TO COMMENTS
Commentor No. 1: Rosa Miller, Auk Kwan

DEAR JEANETTE:

- 1.1 I AM WRITING IN RESPONSE TO YOUR CASCADE POINT ACCESS ROAD D.E.I.S.
I TOLD JOHN FAVRO AND JOE BEEDLE THAT THERE WERE SEVERAL VILLAGES AT
BERNERS BAY AND THAT THERE ARE VILLAGES THERE ARE BURIAL SITES
I GAVE THEM COPIES OF THE MAP OF THE VILLAGE LOCATIONS, I ALSO TOLD
WALLY OLSON.
- 1.2 I HAVE ENCLOSED COPIES OF NOTATIONS I MADE WHILE I WAS READING THE
D.E.I.S. AND COPIES THAT I HAND DELIVERED TO PHIL JANIK'S OFFICE THAT
HE DIDN'T RESPOND TO.
- 1.3 THE SACRED SITES ARE THE SAME AS INDIAN POINT AND SHOULD BE TREATED
AS SUCH.
- 1.4 ASK JOHN FAVRO ABOUT THE PAPERS ABOUT BERNERS BAY THAT I GAVE HIM
DIDN'T ANYONE READ THEM?
- 1.5 THE SIERRA CLUB HAS A LOT OF INFORMATION ABOUT BERNERS BAY THEY
INTERVIEWED MY MOTHER, BESSIE VISAYA AND MY SISTER, MELBE WALLACE
INCLUDING ELDERS.
- 1.6 THE PETROGLYPHS YOU SEE AROUND JUNEAU ARE TO SHOW OWNERSHIP. THERE
IS ONE BY AUK LAKE BECAUSE WE BUILT THAT LAKE AND PUT THE PETROGLYPH
THEPE TO SHOW OWNERSHIP.
IF YOU HAVE ANY QUESTIONS PLEASE CALL ME AT 586-2158

SINCERELY,

RECEIVED

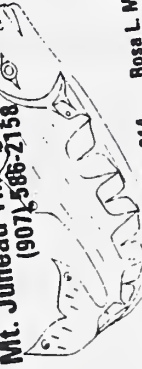
JAN 06 1998

**Juneau Ranger
District**

ENCLOSURES

Rosa L. Miller
ROSA L. MILLER, TRIBAL LEADER OF
THE AUK KWANS

Mt. Juneau Thlinget Dancers
(907) 586-2158



**Rosa L. Miller
Leader**
415 W. Lodi Hwy. Apt. 214
Juneau Alaska 99801

Response to Comment 1.1

The one village site that the Forest Service has information about in Berners Bay was not considered in the Draft EIS because it is far enough away from the proposed road easement that it will not be affected by the road construction. However, to ensure that this or any other archeological sites are not disturbed, there will be a qualified archaeologist on site during construction of the access road.

Response to Comment 1.2

Thank you for your comment. A letter dated December 23, 1997 was sent to you by the Forest Service in reply to your letter to Phil Janik, Regional Forester.

Response to Comment 1.3

We have not been able to corroborate that there are sacred sites in the Cascade Point area. We have been told that the only sacred sites are in the Berners Bay area away from the Cascade Point project area. Given this information, the Cascade Point project area does not appear to be similar in sacredness as Indian Point and does not need to be treated as such. However, to ensure that unidentified archeological sites are not disturbed, there will be a qualified archaeologist on site during construction of the access road.

Response to Comment 1.4

John Favro, Juneau Ranger District, Recreation and Lands Staff Officer, has provided the information you gave him to the Chatham Area Archaeologist. This information relates to Lions Head Mountain and Berners Bay which are not in the vicinity of the proposed access road.

Response to Comment 1.5

The Forest Service has this information on file. This information was used in the preparation of this EIS.

Response to Comment 1.6

Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 2: James Clark

1-6-98
To Juneau Ranger District,
I wish to comment on
the Impact Statement
January 15th on the building
of a 3 mile road from
Echo Cove to Cascade
Point by Goldbelt property.

I am all for it,
Open the roads-up,
bring Juneau up out of
this isolation business.
I want to get out of this
boxed in feeling. I am
sure the bears and moose
can find a place in all the
thousand of acres in the Tongass,
57 million acres. Sincerely,
James Clark
62% in Alaska P.O. Box 35013
alone.

Juneau, AK 99803

PH 403-3489

Response to Comment 2.1

Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 3: Larry and Wanda Zeman

POB 33317
Juneau, AK 99803-3317
January 7, 1998

Juneau Ranger District
Forest Service
Attn: Jenette deLeeuw
Tel: 586-8800
Fax: 586-8808

RE: Comment on Goldbelt Road Extension

Regarding the Goldbelt Road extension, be informed that we strongly support this road. Alaska is mostly wilderness. This development will be positive for the region and permit Goldbelt to carry out their plans.

The grizzly bears and other animals can move over and share some of their habitat with humans. We need this road, and we need this development!

Larry Zeman
Larry Zeman
Wanda Zeman

The Goldbelt Road extension, for the purpose of developing the road, Alaska is mostly wilderness. This development will be positive for the region and permit Goldbelt to carry out their plans.

RECEIVED

JAN 10 1998

Juneau Ranger District

Wanda Zeman
Wanda Zeman

Response to Comment 3.1
Thank you for your comment.

CASCADE POINT ACCESS ROAD
DRAFT EIS

COMMENT FORM

Juneau Ranger District, USDA Forest Service in cooperation with the US Army, Corps of Engineers have prepared a Draft Environmental Impact Statement (DEIS) that presents the environmental analysis of Goldbelt, Inc.'s proposal to extend Glacier Highway north for approximately 3 miles to Cascade Point. Your comments on the DEIS and the proposal are welcome and are due by Feb. 9, 1998.

If you are not currently on the mailing list, and would like to be kept informed about this proposal, please print your name and address in the space provided below. Thank you for your time and participation in this project!

This form can be folded in thirds, with the Forest Service address on the other side showing, and mailed back to the Forest Service, if desired.

For further information about this project, you can also contact Jannette de Leeuw at the Forest Service at 586-8800 between 8:00 am and 5:00 pm weekdays.

NAME: Barbara Turley

ADDRESS: P.O. Box 21134

Auke Bay AK 99821

COMMENTS: I oppose issuing a permit for
the construction of this road. The
values of wilderness and recreation ~~that~~
in Berners Bay that the Forest Service
has assigned ~~a~~ would be compromised
by this.

RECEIVED

JAN 15 1998

Juneau Ranger
District

Response to Comment 4.1

The Final EIS has been expanded to include more information on management direction, including the Land Use Designation (LUD) II prescription located in Berners Bay, from the Tongass Land Management and Resource Plan. Please see Final EIS, Chapter 1, Existing Management Direction and Chapter 4, Issue 3, Impacts to Recreational Activity. The Forest Service Record of Decision provides the rationale for the selected alternative.

CASCADE POINT ACCESS ROAD
DRAFT EIS

COMMENT FORM

Juneau Ranger District, USDA Forest Service in cooperation with the US Army, Corps of Engineers have prepared a Draft Environmental Impact Statement (DEIS) that presents the environmental analysis of Goldbelt, Inc.'s proposal to extend Glacier Highway north for approximately 3 miles to Cascade Point. Your comments on the DEIS and the proposal are welcome and are due by Feb. 9, 1998.

If you are not currently on the mailing list, and would like to be kept informed about this proposal, please print your name and address in the space provided below. Thank you for your time and participation in this project!

This form can be folded in thirds, with the Forest Service address on the other side showing, and mailed back to the Forest Service, if desired.

For further information about this project, you can also contact Jennette de Leeuw at the Forest Service at 586-8800 between 8:00 am and 5:00 pm weekdays.

NAME: Murray Walsh

ADDRESS: 2974 Foster Ave
Juneau, AK 99801

COMMENTS:

GET THE FEIS OUT AND GIVE
GOLDBELT THEIR PERMIT!

5.1

Response to Comment 5.1
Thank you for your comment.

RECEIVED

JAN 15 1998

Juneau Ranger
District

Dec. 15, 1998

RESPONSES TO COMMENTS
Commentor No. 6: Ike Cropley

My name is Ike Cropley. I am a local Tlingit who was born and raised in Juneau.

I have lived and worked here most of my 76 years.

The Goldbelt Echo Cove Project will be good for the people and community of Juneau.

I think Goldbelt has already demonstrated a commitment to operating responsibly in the environment in its recent helicopter logging operations; and,

I also believe Goldbelt will protect any and all cultural and biological resources that may be in the area.

This project should be allowed to go ahead without delay.

Response to Comment 6.1

Thank you for your comment.

A. I. Cropley

RECEIVED

JAN 15 1999

Juneau Ranger
District

A. I. Cropley
Mr. Allen I. Cropley
4104 Broadway
Juneau, AK 99801-8008

CASCADE POINT ACCESS ROAD
DRAFT EIS

COMMENT FORM

Juneau Ranger District, USDA Forest Service in cooperation with the US Army, Corps of Engineers have prepared a Draft Environmental Impact Statement (DEIS) that presents the environmental analysis of Goldbel, Inc.'s proposal to extend Glacier Highway north for approximately 3 miles to Cascade Point. Your comments on the DEIS and the proposal are welcome and are due by Feb. 9, 1998.

If you are not currently on the mailing list, and would like to be kept informed about this proposal, please print your name and address in the space provided below. Thank you for your time and participation in this project! This form can be folded in thirds, with the Forest Service address on the other side showing, and mailed back to the Forest Service, if desired.

For further information about this project, you can also contact Jennette de Leeuw at the Forest Service at 586-8800 between 8:00 am and 5:00 pm weekdays.

NAME: Jim Wilson

ADDRESS: 2255 KASKE AN DR

JUNEAU AK 99801

COMMENTS: good project & will help Junay to
develop new areas - could shorten Ferry Time
To HNS & Stagnary - opportunities for Recreation
& Tourism -

Response to Comment 7.1
Thank you for your comment.

RECEIVED

JAN 15 1998

Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 8: Marilyn Taylor

1-16-98

US Forest Service
Jennette de Leeuw

8.1 I am writing this letter in opposition to building a road to Goldbelt City. If a road is built out to
8.2 Cascade Point, then this wilderness area will no longer be a wilderness. A development will be
8.3 the end of Berners Bay as we know and enjoy it now. The marten and bears will be drastically
reduced in numbers, as your own research indicates. This is a priceless pristine wilderness area
and it is enjoyed as such by a lot of people in Juneau, and this will all change. There just aren't
that many closely wild areas left. I urge you not to allow this road to be built. Thank You.

Marilyn Taylor
Marilyn Taylor

Response to Comment 8.1

We assume that your reference to "Goldbelt City" addresses the proposed development at Cascade Point as described in the Echo Cove Master Plan. Please refer to the Final EIS, Chapter 1, Area Planning and Management (Goldbelt, Inc.) for the origin and purpose of the Master Plan. Please see response to Comment 4.1

Response to Comment 8.2

The direct impacts due to the access road construction and resulting indirect and cumulative effects from the development on private land at Cascade Point result in the following modeled habitat capability percentage reductions: Brown bear, 4%; Black Bear, <2%; Mountain Goat, <2%; and Marten, 7%. When the Juneau Access Improvements, Alternative 2 potential impacts are added to these impacts, the percentages increase to: Brown bear, 35%; Black Bear, <9%; Mountain Goat, <3%; and Marten, 42%. The decision on the Juneau Access Improvements project has not yet been made. The Final EIS, Chapter 4, Cumulative Effects, Wildlife discusses possible effects from projects proposed in the area. Please see response to Comment 19.1 and Table 4-1.

Response to Comment 8.3

The Final EIS, Chapter 4, Cumulative Effects, Recreational Activities discusses possible effects from projects proposed in the area. The Forest Service Record of Decision provides the rationale for the selected alternative.

RECEIVED

JAN 21 1998

Juneau Ranger
District

RECEIVED

JAN 21 1993

Juneau Ranger
District

Jennette de Leeuw
Juneau Ranger District

1-18-97

I am writing to express my opposition to the road to Cascade Point. Berners Bay is fairly close to Juneau and provides a beautiful wilderness area accessible by boat. I have been moose hunting, goat hunting, salmon and trout fishing at Berners Bay, as well as running up there in a skiff and just walking around on a nice sunny summer day. If you build or allow a road to be built, then Goldbelt City will be the next development, and then piecemeal development will occur, until the area is changed forever. It will lose its wilderness character, and become just another spot along the road. Wildlife will disappear, fishing will be ruined, and one more area will be lost. Without the road, this urbanization cannot occur, which will protect this sensitive area. I urge you not to allow this road to be built.

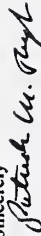
9.1

RESPONSES TO COMMENTS
Commentor No. 9: Patrick Taylor

Response to Comment 9.1

The Final EIS, Chapter 1, Existing Management Direction discusses management prescription for this area and Chapter 4, Cumulative Effects, Wildlife and Recreational Activities discusses possible effects from projects proposed in the area. The Final EIS, Chapter 1, Existing Management Direction provides a description of the management direction for National Forest System lands in the Berners Bay area. The Forest Service does not have jurisdiction over activities on private land. The Forest Service Record of Decision provides the rationale for the selected alternative.

Sincerely



Patrick M. Taylor

RESPONSES TO COMMENTS

Commentor No. 10: Kim Turley and John Lohrey

January 16, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms Leeuw:

Cascade Point Access Road

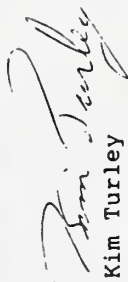
If the road is constructed, I recommend that an adequate parking area be constructed at the northernmost point it traverses Forest Service property, and that the road to that point be kept open to public vehicular travel immediately upon completion of road construction. I feel that this recommendation would resolve many problems.

10.1

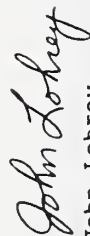
Response to Comment 10.1

This comment was considered in making the decision. Please see the Forest Service Record of Decision for a description of and the rationale for the selected alternative. The selected alternative in the Record of Decision includes a pullout along the National Forest System land portion of the road to provide safe parking for visitors accessing National Forest System land.

Sincerely,



Kim Turley
Box 21-1134
Auke Bay, Ak 99821-1134



John Lohrey
9240 Emily Way
Juneau, Ak 99801

RECEIVED

JAN 21 1998

Juneau Ranger
District



Lynn Canal Conservation, Inc.
Post Office Box 964
Haines, Alaska 99827

RESPONSES TO COMMENTS
Commentor No. 11: Rob Goldberg, Lynn Canal Conservation, Inc.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Rd.
Juneau, AK 99801

JAN 22 1998

**Juneau Ranger
District**

January 20, 1998

Dear Ms. de Leeuw,

- 11.1 | Lynn Canal Conservation opposes the proposed road to Goldbelt City.
- 11.2 | Once again, as per our comments on the Kensington Mine and the Juneau Access Project, we are calling on the Forest Service to do a cumulative EIS for the Berners Bay area. How many more proposed projects need be announced before the Forest Service realizes the consequences that all of them are likely to have on the natural resources of Berners Bay?
- 11.3 | The Forest Service violated NEPA by pre-selecting a road route.
- 11.4 | The effects of the proposed developments at Goldbelt City must be addressed, not just the effects of the road.
- 11.5 | Current populations of marten and brown bear around Berners Bay must be protected.
- 11.6 | The cumulative impacts of this project, and the other proposed projects around Berners Bay, on sport and commercial fishing, trapping, hunting, as well as tourism and recreation must be addressed.

Sincerely,

Rob Goldberg
LCC Vice President

Response to Comment 11.1

The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 11.2

As required by the Council on Environmental Quality regulations in 40 CFR 1508.7 and 1508.25, this EIS considers the cumulative effects of this project and other past, present, and reasonably foreseeable future projects within the Berners Bay area. Please refer to the Final EIS, Chapter 4, Cumulative Effects for a discussion of these, including the Kensington Gold and Juneau Access Projects.

Response to Comment 11.3

On December 19, 1995 the Juneau District Ranger, Goldbelt, Inc. and the Alaska Department of Transportation signed a letter of agreement which described Goldbelt, Inc.'s general plans for development in the Echo Cove area in Juneau, Alaska. By signing this document, the Forest Service agreed with Goldbelt, Inc. that the proposed access road alignment across National Forest System land was a project worth considering. This proposed road alignment was used to develop the proposed action which was presented to the public for comment as part of scoping in January and February of 1996 (please see Chapter I, Proposed Action and Scoping). No decision was made by the Forest Service that this alignment would ultimately be chosen as the selected alternative. The Council on Environmental Quality regulations prohibit committing resources prejudicing selection of an alternative before making a final decision. No resources were committed to selecting this alignment as the proposed access road alignment.

Response to Comment 11.4

The Final EIS, Chapter 4, discloses the potential effects from Goldbelt, Inc.'s proposed development both as an indirect effect of the road construction and as a cumulative effect. In response to comments on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent should the No Action Alternative be selected. Goldbelt has verified in writing that they would pursue construction of a road on private land along the beach under Alternative A - No Action. Therefore, if this should occur, it is reasonable to assume that the development at Cascade Point is likely to be the same under Alternative B, the Proposed Action.

Response to Comment 11.5

The Final EIS, Chapter 4, Cumulative Effects, Wildlife discusses possible effects from projects proposed in the area.

Response to Comment 11.6

The Final EIS, Chapter 4, Cumulative Effects, Wildlife and Recreational Activities discusses possible effects from projects proposed in the area.

**ECHO RANCH
BIBLE CAMP**

PO Box 2110608
Aakle Bay, AK 99821
(907) 789-3777



RECEIVED

January 23, 1998

JAN 26 1998

Juneau Ranger
District

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RE: Cascade Pt Road Access DEIS

As a landowner in Echo Cove, we appreciate the opportunity to comment on the Cascade Point road proposal. Echo Ranch Bible Camp does not take a position in either opposition or support of the road but we do have several comments about the Draft Environmental Impact Statement.

We actually question the need for a full scale EIS on this project. The impacts being evaluated relate only to extension of an existing road 2.5 miles to private land with a 26 foot road bed - hardly the kind of thing envisioned by the National Environmental Policy Act as a significant federal impact. It is our understanding that the DEIS does not evaluate impacts of the proposed Goldbelt developments on private land but simply on the road environment itself. Our comments are thus directed at cumulative effects that might occur as a result to any change in access to the Echo Cove area.

First, please note that the Echo Ranch Bible Camp property is incorrectly identified as Echo Cove Bible Camp throughout the report.

Any change to the Glacier Highway access to Echo Cove, such as extension, paving, better winter maintenance, etc. could have an effect on the use at Echo Ranch Bible Camp. Our season of use from late April through September is partially dictated by access to Echo Cove. A winter maintained road could conceivably increase our client use at the Camp by extending the season.

For your information, following is a summary of the camper use at Echo Ranch Bible Camp that occurred in 1997.

- 2,713 paid clients who used the facility
- 8,242 camper days (a camper day is a 24 hour period of time spent by one person at camp)
- 5,128 of the camper days (62%) of the total use was in the 9-week summer program
- 3,114 camper days were from spring and fall school, church and family camps
- Over 1,200 school children from seven Juneau schools used the facility for outdoor education

The above use figures do not count use by permanent and seasonal staff which can number over 50 people in the summer. We bring these figures to your attention because in the Affected Environment chapter of the DEIS there is mention of the recreational use at nearby, Point Bridget State Park but little discussion of the use at Echo Ranch Bible Camp.

We do not see major impacts to habitat or recreation as a result of the road alignment itself. Future Goldbelt road projects will impact our access at Echo Ranch more than this project and we look forward to working with the Nauve Corporation as neighboring landowners.

Thank you for sending us the DEIS.

Sincerely,

Gary V. Lidholm
Gary V. Lidholm
Director, Echo Ranch Bible Camp

RESPONSES TO COMMENTS

Commentor No. 12: Gary Lidholm, Echo Ranch Bible Camp

Response to Comment 12.1

Thank you for your comment. The initial scoping in January 1996 was intended for the preparation of an Environmental Assessment. Based on public comment and potential significant environmental impacts from the proposed project, the Forest Service decided to prepare an Environmental Impact Statement.

Response to Comment 12.2

We have made this change and have correctly identified your property as Echo Ranch Bible Camp.

Response to Comment 12.3

Thank you; we have added this information to the Final EIS Chapter 3, Recreation and Chapter 4, Description of Other Projects and Cumulative Effects, Recreational Activities.

Response to Comment 12.4

Thank you for the information; we have added this information to the Final EIS, Chapter 3, Recreation and Land Ownership and Management.

Response to Comment 12.5

Thank you for your comment.

January 25, 1998

RECEIVED

JAN 27 1998

Juneau Ranger
District

Ms. Jennifer de Loeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RE: Cascade Point Access Road-Draft Environmental Impact Statement

Dear Ms. De Loeuw:

Having reviewed the impact statement, I believe the proposed Cascade Point Access Road would lead to an unacceptable amount of development on Cascade Point. As pointed out in the statement, if the road is built Goldbelt Inc. plans to build public facilities including a fast ferry operation, a commercial fishing support dock, a convenience store and gas station. Gold Belt has also publicly said they have plans to build housing and possibly a school at this location.

Currently, Berners Bay is wilderness. As stated in the impact statement, the likelihood of being able to enjoy a remote wilderness experience in this area is good. Use of the surrounding national forest land and Point Bridget State Park for wilderness recreational purposes is high. There is no other comparable location as easily and safely accessible from Juneau which provides this same wilderness recreational experience. For this reason, this area is unique and valuable, left as undisturbed by man as possible.

There are other locations however, which can be used for building convenience stores, gas stations, housing, fishery docks etc. These items are not "unique" treasures, which can't ever be restored to their original condition. The wilderness in this area is unique, and cannot be restored once it has been developed.

If development is encouraged in this area, it will benefit Goldbelt Inc. However, it will be at the detriment of current users of the Point Bridget State Park and Forest Service Land in the area. As stated in the impact statement, the amount of boat traffic to the Bay, including commercial barges, will increase directly proportional to the amount of development which occurs at Cascade Point. Facilities on the Point will be also be very visible from Point Bridget State Park, the bay itself, and various other Forest Service beaches surrounding the bay.

For these reasons, I recommend that the Forest Service adopt Alternative A, no action. Although Goldbelt may still build a lodge and some facilities at the point even without a road, there will not be nearly as much development as will occur with a road. The more development which occurs, the less valuable the area will be to State Park and Forest Service Land wilderness recreational users. The Forest Service should strive to maintain this area as wilderness. It should not take actions to encourage its development.

Sincerely



David Duntley
1290 Mendonhall Peninsula Road
Juneau, AK 99801

RESPONSES TO COMMENTS
Commentor No. 13: David Duntley

Response to Comment 13.1

The Forest Service does not have jurisdiction over activities on private land. Please see response to Comment 11.4

Response to Comment 13.2

Please refer Comments 4.1 and 8.3.

Response to Comment 13.3

The Echo Cove Master Plan (MRV, March, 1996) discusses plans for development on Goldbelt, Inc.'s private land at Cascade Point. The Forest Service does not have jurisdiction over activities on private land.

Response to Comment 13.4

The Final EIS, Chapter 4, Cumulative Effects, discusses the potential effects from Goldbelt Inc.'s proposed development at Cascade Point. The Forest Service Record of Decision provides the rationale for the selected alternative. Please refer to the Final EIS, Chapter 4, Cumulative Effects, Visuals for a discussion and artist renditions of the view of Cascade Point from Point Bridget State Park.

Response to Comment 13.5

Please see responses to Comment 4.1.



CHANNEL CORPORATIONS

Channel Construction, Inc. W.R. Tongard Logging and Lumber, Inc.
Channel Landfill Channel Equipment Rental, Inc.

W.R. "SHORTY" TONGARD, CHAIRMAN OF THE BOARD

RESPONSES TO COMMENTS
Commentor No. 14: W.R. Tongard, Jr., Channel Corporation

FACSIMILE TRANSMITTAL TO 586-8808

January 29, 1998

Ms. Jennette de Leeuw
USDA Forest Service
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RE: Proposed Action B
2.5 Mile Access Road to Cascade Point

Dear Ms. de Leeuw:

I support the Goldbelt, Incorporated, Proposed Action of Building a 2.5 Mile Access Road to Cascade Point. "Proposed Action B".

At the present time, there is no commercial access to the water anywhere north of Auke Bay. Even that is very restricted, and the downtown Juneau barging and marine traffic is congested. Increased marine development in the Cascade Point area would have a positive economic effect on Juneau, Haines and Skagway, as well as some of the smaller communities.

The City and Borough of Juneau's Comprehensive Plan of 1984 designated this area for new growth, and has encouraged development of this area.

The U.S. Forest Service appears to anticipate development in this area with their road alignment, which suggests an expectation of a road right-of-way for eventual access and land development in this area. The only public land to be used is the U.S. Forest Service's designated road.

Response to Comment 14.1

Although on private land and outside the jurisdiction of the Forest Service, Goldbelt, Inc. has identified in their Master Plan the potential for a ferry located at Cascade Point.

Response to Comment 14.2

The City and Borough of Juneau's Comprehensive Plan of 1984 applies to Goldbelt, Inc.'s private land. This EIS has been prepared to analyze the direct effect of the road easement on National Forest System lands and the indirect effect of development of Goldbelt, Inc.'s private land.

Response to Comment 14.3

The Final EIS, Chapter 1, Existing Management Direction includes a description of the management prescription for the road corridor.

14.1

14.2

14.3

This project has been thoroughly planned and studied, the impact to the public is minimal, and reasonable mitigation for identified impacts is proposed.

Public input should not restrict the use of private land, if the development is done in an environmentally sound manner. Goldbelt has a history of environmentally sound management of their lands. The development plan minimizes direct development impacts to Echo Cove, and will only develop about 10% of their private land.

This project will have a positive effect for the entire Lynn Canal region, I support it, and request the Forest Service also support this project.

Thank you.

Very truly yours,



W. R. Fongard, Jr.
Chairman of the Board

WRT:dk

Response to Comment 14.4

Goldbelt, Inc.'s development of their private lands is outside the jurisdiction of the Forest Service. However, the Council on Environmental Quality regulations require us to show not only the direct effect of road construction on National Forest System lands but also show the indirect effect of development of Goldbelt, Inc.'s private land. Of the three alternatives considered in this EIS, only the No Action Alternative restricts access to Goldbelt private land. The Council on Environmental Quality (CEQ) regulations require consideration of the No Action Alternative.

Larry Musarra
6729 Sherri St.
Juneau, AK
99801
907-586-0152
lmusarra@alaska.net

January 29, 1998


Ms. Jannette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. de Leeuw:

I am writing to express my concern over the Forest Service's plans to allow Goldbelt to build a road to Cascade Point. I am definitely opposed to the road! Cascade Point is such a beautiful kayaking destination and I would hate to see that wilderness destroyed with a road and future development in the area.

The inevitable development which will disrupt marten and brown bear habitat, create a negative effect on fishing and recreation, and cause a decline in the quality of the watershed. Please consider the effects the road will have on this scenic wilderness area.

Sincerely,


Larry Musarra

RESPONSES TO COMMENTS
Commentor No. 15: Larry Musarra

Response to Comment 15.1

Please see response to Comment 8.3.

Response to Comment 15.2

Please see response to Comment 4.1 and 11.5.

RECEIVED

JAN 29 1998

Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 16: Romer E. Derr

Jan. 29, 1998

Ms. Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Rd
Juneau, Ak 99801

Dear Ms. De Leeuw,

Please accept this letter as a statement in favor of "Proposed Action B" which is the 2.5 mile Access road to Cascade Point.

I favor opening the area of Goldbelt lands that have been designated "New Growth Area" for so long and feel that the impacts have been identified and addressed so only good can come from this construction.

I thank you for taking the time to consider my opinion in favor of this project

Sincerely



Romer E. Derr
9325 View Drive
Juneau, Alaska 99801

Response to Comment 16.1

Thank you for your comment. The Forest Service Record of Decision provides the rationale for the selected alternative.

RECEIVED

JAN 30 1998

Juneau Hanger
District



UNITED
INSURANCE

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JAN 30 1998

Juneau Ranger
District

January 29, 1998

P.O. Box 33519
JUNEAU, ALASKA 99803
(907) 789-5208
FAX (907) 789-1856

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Re: Goldbelt, Inc. proposed action of building a 2.5 mile access road to Cascade Point

Dear Jennette:

The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984. The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

17.1

The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway. The project impacts have been identified and thoroughly addressed. I support this access road.

17.2

Sincerely,

Dave Moe

RESPONSES TO COMMENTS
Commentor No. 17: David Moe, United Insurance

Response to Comment 17.1

Please see response to comment 14.2 and 14.3.

Response to Comment 17.2

Please see response to Comment 14.1

4103 Blackerby Street
Juneau, AK 99801
January 30, 1998

Ms. Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. de Leeuw:

As a frequent recreational user of Berners Bay (kayaking, camping, sport fishing) and 15 year resident of Juneau, I am writing to express my concerns about the proposed road extension of Glacier Highway from Echo Cove to Cascade Point.

In particular, I am most concerned that the current Draft EIS about the Cascade Point road extension acts as though the entire impact of the road is limited to the 2.5 miles of road construction and does not deal with the broader implications that massive development of the area at the end of the road would bring about. Since the construction of an entirely new community on Goldbelt land at the end of the proposed road extension will obviously mean big changes for Berners Bay, I think the EIS needs to take a good hard look at all the cumulative impacts that the road and resulting community (so called Goldbelt city) would very directly have on the surrounding USFS lands. Like impacts on sport fishing, commercial fishing, hunting, trapping and commercial and non-commercial recreational tourism uses of the Bay. Furthermore, I understand there are real procedural concerns about whether NEPA guidelines requiring alternatives to the proposed road have even been followed to the letter and spirit of the law.

I personally am opposed to this road extension plan and believe the rest of the community will too when the connected actions and cumulative impacts of this project are understood by the public at large.

Sincerely,



Randall B. Wiest

RESPONSES TO COMMENTS Commentor No. 18: Randall E. Wiest

Response to Comment 18.1

Please see response to Comment 11.4 and the Final EIS, Chapter 4, Recreational Activities.

Response to Comment 18.2

Please refer to the Final EIS, Chapter 2, Alternatives. The document discusses a range of alternatives including the proposed action and the no action alternative plus alternatives eliminated from detailed study as required by the Council on Environmental Quality regulations implementing the National Environmental Policy Act (NEPA) in 40 CFR 1502.14.

Response to Comment 18.3

The public has had the opportunity to comment on this proposal since January 1996. Please see the Final EIS, Chapter 1, Scoping for the scoping history of this project and Appendix A for a listing of comment letters from the public responding to the Draft EIS.

Box 20993
Juneau, AK 99802
January 24, 1998

RECEIVED
FEB 02 1998
Juneau Ranger
District

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RE: Cascade Point Access Road Draft EIS

Dear Ms. Leeuw:

I attended the Open House for the Cascade Point Access Road Draft Environmental Impact Statement on January 15, asked questions which were answered and now have read the document. Please include these comments when reviewing the adequacy of the statement and the merits of the alternatives discussed.

1. There are confusing statements in the document that could influence public comment inappropriately.

A. Summary, Table S-2 (also page 2-5, Table 2-2)

Alternative A information includes the impacts of the development only on Goldbelt's

property at Cascade point:

22% reduction of modeled brown bear carrying capacity, 13% reduction of modeled marten carrying capacity, less than 2% reduction of modeled black bear carrying capacity, less than 1% reduction of mountain goat carrying capacity (if lodge constructed).

Alternative B, to be consistent, should include the impacts of the development on Goldbelt, Inc. private land as well as the impacts of the road development. It does not.

19.1

A person giving the document a quick study might think there are LOWER impacts to wildlife under Alternative B and by extension, Alternative C.

In my opinion, the issue of impact of the potential development on Goldbelt, Inc. private land should be listed in a separate manner, so that the reader can easily see that it affects all the Alternatives, not just Alternative A. As written, the summary does a poor job of showing that Alternative A would eliminate any effects on wildlife due to road construction. The importance of this chart is to allow the reader to compare the impacts of the Cascade Point access alternatives. It doesn't clearly do this.

19.2 B. Page 4-11, Juneau Access Road (This title should be changed to Juneau Access Improvements)

In the Juneau Access, Draft Environmental Impact Statement, Project No. STP-00S(131), several alternatives are carried forward including Alternative 1, 2, 4A, 4B, 4C and 4D. Your description of the Juneau Access DEIS states: "The proposed action is a 6.5-mile, 2 lane highway on the east side of Lynn Canal... The Draft EIS indicates that road construction could begin as early as 2000 and be completed by 2005." (page4-11)

19.3

Response to Comment 19.1

Thank you for your comment. Tables S-2, 2-2 and supporting text in the Final EIS, Chapters 2 and 4, Wildlife have been changed to present the information more clearly.

Response to Comment 19.2

Thank you for your comment; we have corrected the title to Juneau Access Improvements.

Response to Comment 19.3

Thank you for your comment; we have corrected our discussion of the Juneau Access Improvements Draft EIS alternatives in the Final EIS, Chapter 4, Description of Other Projects.

↑ You lead the reader to assume that DOT has selected the proposed action of building a road, and that it could begin construction as early as 2000. You've done some selective reporting.

As far as I know DOT has not selected a preferred alternative. You do not fairly represent the proposed action of DOT for Juneau Access. Many factors may cause DOT to select a proposed action of improved ferry service. It might be that a road has very little chance of being built from Echo Cove to Skagway. Your 'Description of Other Projects' must do a better job of describing the Juneau Access Alternatives so that the reader receives accurate information upon which she/he will determine the best Alternative for Cascade Point Access.

19.3, continued

19.4 [C. The Lacey River Hydroelectric project has been withdrawn.

2. The Bibliography is incomplete. The Juneau Access Draft Environmental Impact Statement, Project No. STP-00S(131) is not listed. Additionally, other documents that support information in Cumulative Effects, page 4-10, are not listed. Please supply a complete Bibliography.

The Cascade Point Draft EIS conveys misinformation. It should be corrected.

The merits of Alternative A exceed those of Alternative B or C in these ways:

- no impact on wildlife due to road construction and use;
- no impact on fish due to road construction and use;
- no impact on recreation due to road construction and use;
- avoidance of all wetland impacts requiring Corps of Engineers authorization due to road construction and use;
- no impact on cultural resources due to road construction and use;
- development on Goldbelt, Inc. private land could still occur without road construction and use;

Building the road is speculative sprawl, for private gain, at habitat expense, on public property.

The USFS should select Alternative A as the preferred alternative because:

- water access is available to Goldbelt private property;
- community infra-structure between our CBJ urban service boundary and the proposed project has not been planned to support this development;
- Alternative A reinforces the CBJ community need to control sprawl;
- DOT has not completed the Juneau Access, DEIS decision;
- quality of life issues (including degradation of USFS habitat by road construction) are best served by Alternative A;
- the minerals economy is currently depressed;
- Alternative A buffers the Berners Bay LUD II area from impacts of increased human development including motorized access by road.

The By-pass road at Auke Recreation (DOT project supported by the USFS) improves safety and recreation issues important to CBJ. It is an appropriate project to be developing. In my opinion, it is premature to select Alternative B or C for the Cascade Point Access Road DEIS.

Thank you for your consideration.

Sincerely,
Nancy Waterman *Nancy Waterman*

Copy: CBJ Mayor Egan and Manager Palmer
Commissioner Perkins, DOT

Response to Comment 19.4

Thank you for your comment; we have made the correction. Please see the Final EIS, Chapter 4, Description of Other Projects.

Response to Comment 19.5

Thank you for your comment; we have corrected the list in Chapter 6 to include the Juneau Access Improvements Draft EIS and documents cited in the Final EIS, Chapter 4, Cumulative Effects.

Response to Comment 19.6

The Final EIS, Chapter 4 discusses effects on wildlife, fish, recreation, wetlands and cultural resources due to the road construction and use. The Forest Service does not have jurisdiction over activities on private land. Analysis of the no action alternative considers Goldbelt, Inc.'s plans for development at Cascade Point if the road easement were not authorized. The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 19.7

The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 19.8

Thank you for comment.

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FEB 02 1998

Juneau Ranger
District

January 29, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau AK 99801

Dear Ms. de Leeuw

Please accept my comments regarding the proposed Goldbelt road access to Cascade Point, specifically, the Proposed Action B, the Forest Service Preferred Alternative.

This development is proposed for private land and, in my view, ought not be unreasonably restricted as failure to allow an extension of the road 2.5 miles to Cascade Point will certainly do. Encouragement of development in this area is further supported because the Goldbelt Echo Cove lands are designated as a "New Growth Area" in the City and Borough of Juneau Comprehensive Plan. The U.S. Forest Service road alignment itself clearly expects a road right-of-way for access and development in this area.

20.1

I would also offer that Goldbelt's plans call for only about 10% of the private land in the area to be developed. This enlightened planning minimizes development impacts to Echo Cove and the mitigation proposed for the identified impacts is appropriate and responsible.

20.2

I urge you to take positive and expeditious action to accept Proposed Action B, the Forest Service Preferred Alternative for the Goldbelt, Inc., Proposed 2.5 Mile Access Road to Cascade Point.

Respectfully,



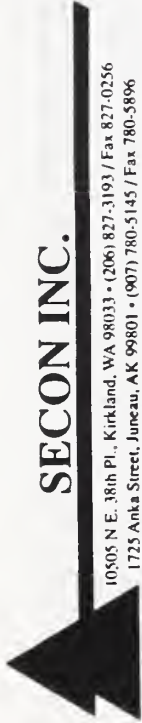
James K. Collard
9370 Northland St.
Juneau, AK 99801
(907) 789-4354

Response to Comment 20.1

Please see response to Comments 14.2 and 14.3.

Response to Comment 20.2

Thank you for your comment. Please see the Forest Service Record of Decision for a description of the selected alternative and the rationale for the decision.



SECON INC.

10505 N.E. 38th Pl., Kirkland, WA 98033 • (206) 827-3193 / Fax 827-0256
1725 Anka Street, Juneau, AK 99801 • (907) 780-5145 / Fax 780-5896

RESPONSES TO COMMENTS
Commentor No. 21: Ian M. Black, Secon, Inc.

RECEIVED

FEB 02 1999

Juneau Ranger
District

Date: 1-29-98

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Re: Cascade Point Access Road

Jennette:

We at Secon Inc. would like to express our support for Goldbelt's proposed access road to Cascade Point. We feel that "Proposed Action B" would be appropriate, and are convinced that the plans for this development fit well into the overall Comprehensive Plan of the CBJ. In addition to creating growth potential, the advent of improved access to the upper Lynn Canal communities would have a positive influence for the region as a whole. We feel strongly that these types of projects are necessary for the continued success and well being of Juneau and the surrounding communities. Thank you in advance for your time and consideration on this matter.

21.1

Cordially:


Ian M. Black - Secon Inc.

Response to Comment 21.1

Thank you for your comment.

January 30, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Re: Cascade Point Access Road

Dear Jennette,

22.1 I am writing to voice my strong support for "Proposed Action B" for the Goldbelt 2.5 mile access road to Cascade Point

22.2 There are several reasons that I feel that this action must be supported. First, the CBJ comprehensive plan developed in 1984 designated this area as a "New Growth Area", and the construction of this planned road is consistent with the guidelines set forth in the comprehensive plan.

22.3 Secondly, with the exception of a small part of the road being on Forest Service land, the proposed development will take place on private land. Goldbelt is only looking to develop a small percentage of their land in the area, and will do so in a manner that minimizes impact to the surrounding area. From what I know of the project, it appears that Goldbelt has made a genuine effort to identify the impacts of the proposed development and take measures to mitigate such impacts to the extent that such mitigation is reasonable while still allowing some development.

Further, as this is on private land and the proposed development would be carried out in a responsible manner, it is completely unreasonable to prohibit development on private land, especially in an area designated as "New Growth Area" by the CBJ comprehensive plan. Most opponents to this plan are merely looking to keep their exclusive playground (a.k.a. public lands of Barbers Bay) from being accessed by other members of the public. They do not have this right!

22.4 There are potentially some substantial long-term benefits to this proposed development, including improved marine transportation services in northern Lynn Canal.

22.5 Aside from all of these rational reasons, I feel that there are fundamental property rights that risk being violated when private citizens and government agencies "take" private property from other without due compensation by not allowing development of any sort because any impact is too much for their liking. Please protect Goldbelt's constitutional rights!

Sincerely,

Rick Shattuck
Rick Shattuck
2551 Vista Drive, #C302
Juneau, AK 99801

RESPONSES TO COMMENTS

Commentor No. 22: Rick Shattuck

Response to Comment 22.1

Please see the Forest Service Record of Decision for a description of the selected alternative and the rationale for the decision.

Response to Comment 22.2

Please see response to Comment 14.2.

Response to Comment 22.3

The Forest Service has jurisdiction only on National Forest System lands. This EIS displays the effects of development along the road easement as well as the indirect effect of development of the private land at Cascade Point.

Response to Comment 22.4

Please see the response to Comment 14.1.

Response to Comment 22.5

Thank you for your comment. Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority.

RECEIVED
FEB 02 1998
Juneau Ranger
District



R&M ENGINEERING, INC.
ENGINEERS
GEOLOGIST'S
SURVEYORS

8005 GLACIER HWY • P.O. BOX 34278 • JUNEAU, ALASKA 99803 • PHONE 807 780 8050
FAX 807 780 4811

RESPONSES TO COMMENTS

Commentor No. 23: Malcolm A. Menzies, R&M Engineering

January 30, 1998

Jeanette deLeeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Re: Glacier Highway Extension
Cascade Point Access

Dear Ms. deLeeuw:

23.1 This letter is in support of your selection for proposed Action B, the Forest Service preferred alternative for the extension of Glacier Highway 2.5 miles to Cascade Point. The road, as I understand it, is to be developed by Goldbelt Inc. on Forest Service right-of-way within lands selected by Goldbelt and near lands selected by the City & Borough of Juneau

23.2 Our firm and individuals therein support orderly State/Community growth and development. Proposed development that will spur from this road extension is planned for private land and near some government land. Development of private property and properly planned public properties should not be restricted and must be allowed, if reasonable. Goldbelt's plan allows for reasonable growth and development. All impacts for the proposed Goldbelt project have been identified and thoroughly addressed. Mitigation measures identified and proposed are appropriate and reasonable for the action.

Should there be questions, or if we may be of further assistance, please do not hesitate to contact us at your convenience

Sincerely,

R&M ENGINEERING, INC.

Malcolm A. Menzies, P.E., L.S.

Ysh

C:\WP61\110806\LET108LEEUW.LET

Response to Comment 23.1

Thank you for your comment.

Response to Comment 23.2

Please see the response to Comment 22.3.

BEAR CREEK OUTFITTERS
FLY FISHING & LIGHT TACKLE
GUIDE SERVICE

3718 El Camino Juneau, Alaska 99801
(907) 789-3914 phone/fax akeid@alaska.net



RESPONSES TO COMMENTS

Commentor No. 24: Mark and Michelle Kaelke, Bear Creek Outfitters

February 3, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RE: Proposed Cascade Point Road

Dear Ms. De Leeuw:

We are submitting these comments on the proposed road to Cascade Point in Berners Bay. Our business operates fly fishing excursions to Sawmill Creek and we provide our trips as opportunities to fish in wilderness areas on the Tongass.

Our concern is the cumulative impact a road will create in this congressionally designated roadless watershed. We feel the Forest Service should not only conduct a review of the road itself, but consider what the road's future impact will be on the entire area. We understand that Goldbelt is planning to build a community near the end of the road and that the Kensington and Jualin mine operations would also utilize it. These uses are certain to compromise the wild character of the Berners Bay LUD II area and therefore should be scrutinized before a permit for a road is issued.

We ask that the Forest Service consider all of the cumulative impacts of this road and ensure the LUD II status of Berners Bay remains intact.

Sincerely,

Mark & Michelle Kaelke

Mark and Michelle Kaelke

Response to Comment 24.1

Please see the Final EIS, Chapter 4, Cumulative Effects, for a discussion on the potential effects from projects proposed in the area. Please see response to Comment 4.1.

February 3, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Re: *Goldbelt, Inc. Proposed Action,
Building a 2.5 Mile Access Road to Cascade Point*

This letter is written in support of "Proposed Action B" facilitating road construction consistent with Goldbelt's long-range plans at Cascade Point. As the lead planning firm on this project, we have an interest in this action as the first step to implement what we earnestly believe to be a very prudent and appropriate development goal.

Although MRV Architects was hired by Goldbelt to plan their Echo Cove land base, Goldbelt maintained a very separate role while planning was underway to insure that the resultant planning product reflected a professional, uncolored recommendation on how to minimally develop the land for economic return, while preserving the significant environmental and cultural values of the land. As you know, the total long-term development is a small fraction of the total acreage potentially available for development.

We believe Goldbelt's process to identify prudent land development goals has been exemplary, and establishes a worthy benchmark for other corporate institutions. We therefore recommend prompt Forest Service approval of the road extension proposal.

Sincerely,



Paul Voelckers

RECEIVED

FEB 06 1998

Juneau Ranger
District

Response to Comment 25.1

Thank you for your comment. Please see the Forest Service Record of Decision for a description of the selected alternative and the rationale for the decision.

160 Behrends Ave.
Juneau, AK 99801

February 4, 1998

Jenette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. De Leeuw,

I understand the Forest Service is proposing to extend Glacier Highway 2.5 miles past Echo Cove to Goldbelt land at Cascade Point. I very much want to see Berners Bay remain as much a wilderness area as possible. I want the road to remain as is, with its current end point.

I see the extension of the road mainly as a means to allow Goldbelt to develop a marina and future town. The effect of this development needs to be included in the assessment of the road extension proposal. What this development will mean for threatened species also needs to be considered.

Development of land at Berners Bay will be a big loss for me on a personal level also. As Juneau has grown over the years the opportunity to get to quieter places becomes more and more valuable to me. I often hike, camp and boat in the Berners Bay area. I value Berners Bay for its wilderness feel. Sawmull Creek in particular is very close to Cascade Point. I am concerned about the impact of a road, and the development that will ensue, on a such a special place. I do not favor building a road for the benefit of one corporation at the possible expense of the general public. I realize that Goldbelt is free to do what it wants with its land, but I do not think the Forest Service should be involved with building a road across public land to Goldbelt's land.

Sincerely,

Marinke van Gelder

Marinke van Gelder

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FEB 06

Juneau Ranger
District

RESPONSES TO COMMENTS Commentor No. 26: Marinke van Gelder

Response to Comment 26.1

Please see response to Comment 4.1.

Response to Comment 26.2

The Final EIS, Chapter 1 discusses the Proposed Action, and Chapter 4, Cumulative Effects discloses the potential effects from Goldbelt, Inc.'s proposed development at Cascade Point.

Response to Comment 26.3

Please see Final EIS, Chapter 3, Wildlife for a discussion on Threatened and Endangered Species. Biological Evaluations were completed for Threatened, Endangered, and Forest Service Region 10 Sensitive plant and animal species occurring in the areas that may be impacted by this project. These documents are available in the project planning record.

Response to Comment 26.4

Please refer to the Final EIS, Chapter 4, Cumulative Effects, Recreational Activities for a discussion of potential effects from projects proposed in the area.

Response to Comment 26.5

Thank you for your comment. Please see the Final EIS, Chapter 1, Proposed Action for the project description and Existing Management Direction for Forest Service policy on providing access across National Forest System lands to private lands.

February 5, 1998

RECEIVED

FEB 06 1998

Juneau Ranger
District

Ms. Jeannette de Leeuw
Juneau Ranger District
USDA Forest Service
8465 Old Dairy Road
Juneau, AK 99801

Murray R. Walsh, AICP
2974 Foster Ave.
Juneau, Alaska 99801

Voice (907) 586-4083
FAX (907) 586-4093
mwalsh@piataska.net

Dear Ms. de Leeuw:

Thank you for providing a copy of the subject DEIS for review. I have indeed reviewed it and find it to be a complete and fully adequate disclosure of the potential effects of Goldbelt's request. I have nearly 30 years of background in the review of such documents and I wish to commend the USFS staff and contractors on a job well done.

I also commend the Forest Service for selecting the public road as the preferred alternative. Frankly, given the policy background of this matter, you had little choice. The alignment involved is a strip of land *retained* by USFS in the course of various land exchanges. There could be no other purpose for such a strip than use as a roadway. Therefore, it is somewhat troublesome to me that there could be any doubt over what USFS will do in response to Goldbelt's application.

The applicant is clearly following federal policy for this area and is undeniably doing what the federal government intended when the strip of land was retained. Despite this standing policy, I fear that some onlookers still believe it is possible for the USFS to deny Goldbelt's application if enough letters are written and enough adverse pressure is applied. If the DEIS had revealed that some environmental disaster will occur, then USFS might have grounds to deny the application. No such adverse impact was revealed, despite a diligent search for the same. So, I believe that USFS is duty bound to issue a permit for the road. I think it would be useful for the public to understand this obligation and I suggest that it be fully explained in the ROD. You are doing what prior policy says you must, and you should say so. Thanks for the opportunity to comment.

Sincerely,


Murray R. Walsh, AICP

RESPONSES TO COMMENTS
Commentor No. 27: Murray R. Walsh

Response to Comment 27.1

Thank you for your comment. Please see the Forest Service Record of Decision for a description of the selected alternative and the rationale for the decision.

Bruce H. Baker
P.O. Box 211384
Auke Bay, Alaska 99821
e-mail:
bbaker@alaska.net

Phone & Fax:
(907) 789-9354

February 5, 1998

Jennette de Leeuw
Juneau Ranger District
U.S. Forest Service
8465 Old Dairy Road
Juneau, AK 99803

RECEIVED

FEB 06 1998

Juneau Ranger
District

Subject: Cascade Point Road DEIS

Dear Ms. Leeuw:

I appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Goldbelt road along a Forest Service corridor through Goldbelt and national forest land.

Inherent Forest Service Bias Toward Proposed Action. *The Forest Service appears to have prejudiced the National Environmental Policy Act (NEPA) process by deciding back in 1995 that a Goldbelt access road should follow the alignment that is now being proposed in the DEIS.*

Page 1-4 of the Forest Service DEIS states that "In 1995, recognizing the need to eliminate the possibility of parallel routes through the area, Goldbelt, Inc., the Forest Service, and ADOT&PF signed an agreement recognizing one road alignment through the area. The agreed-upon alignment would roughly follow the existing road alignment on National Forest System land. Goldbelt, Inc. and the ADOT&PF further agreed that should the ADOT&PF need further widening for future road construction, Goldbelt, Inc. would allow widening of the right-of-way onto their private land to a width of 200 feet."

By entering into the above mentioned agreement, it appears that the Forest Service biased the range of reasonable alternatives that are featured in the DEIS. This seems to be in direct conflict with Council on Environmental Quality's (CEQ) regulation 40 CFR 1502.2(f) which states that "Agencies shall not commit resources prejudicing selection of alternatives before making a final decision."

Misrepresentation of the Water Access Alternative. By mistakenly identifying the existing water access alternative as merely a no action alternative in the DEIS, the Forest Service has misled the public. The fact is that water access is far more than a no action option. It is a reasonable and prudent alternative that is consistent with the regulatory standards of the Alaska Coastal Management Program (ACMP, Alaska Statute 46, and 6 Alaska Administrative Code 80). It should be presented in the DEIS as a viable and preferred alternative to an upland road

Response to Comment 28.1

Please see response to Comment 11.3.

Response to Comment 28.2

The Final EIS, Chapter 2, Alternatives Eliminated from Detailed Study includes a discussion on water access. Water access is one option that Goldbelt, Inc. can choose if their request for an easement is denied under the No Action Alternative. However, it is not an alternative that the Forest Service has jurisdiction over. The Forest Service jurisdiction is only on actions on National Forest System land. Please see the Final EIS, Chapter 1, Existing Management Direction.

The Forest Service's failure to include in the DEIS a thorough evaluation of the water access alternative leaves the public with insufficient information to compare and evaluate the environmental, social, and economic benefits and costs of this alternative alongside those of the Forest Service's preferred upland access alternative.

28.2

Scope of DEIS. The scope of the DEIS appears to be inconsistent with CEQ regulations regarding "connected actions" and "cumulative actions" (40 CFR 1508.25(a)(1) & (2)). These regulations spell out what agencies shall consider in determining the scope of environmental impact statements. Considerations include:

Connected Actions (40 CFR 1508.25(a)(1)). "Connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they: (i) Automatically trigger other actions which may require environmental impact statements."

28.3

The site-specific analysis of these actions needs to be sufficiently detailed to permit assessment of cumulative environmental effects of the proposed action. The treatment in the DEIS of Goldbelt's proposed development at Cascade Point is insufficient for this purpose. For example, it is unclear from the DEIS how such development would affect existing uses of Echo Cove and Berners Bay resources and the viability of projects such as the Kensington Mine.

In addition, the statement on Page 4-11 of the DEIS that "... the Juneau Access Road would follow the same alignment as the proposed Goldbelt easement ..." means that these two projects are connected actions and reinforces the argument that they should be considered together in the same EIS. It does not appear that the Forest Service can legitimately use the fact that the Federal Highway Administration and the Alaska Department of Public Facilities (ADOT&PF) took the "lead" on Juneau Access as a reason not to meet its obligation under the CEQ regulations.

28.4

Cumulative Actions (40 CFR 1508.25(a)(2)). "Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement."

The proposed Cascade Point road, the proposed Juneau access road, the Kensington Mine, and other proposed actions in the Berners Bay area are cumulative actions which have cumulatively significant impacts on wildlife species such as brown bears and goats and on economically important wildland uses of the sort that people seek in Forest Service Land Use Designation II areas. All such projects should, therefore, be addressed in the same EIS.

28.5

In light of these two regulations, it appears indefensible that three separate EISs (Cascade Point road, Juneau-Shagway road, Kensington mine) rather than one comprehensive EIS have been made available for public comment in a period of just one year.

Comparison of Wildlife Habitat Carrying Capacity by Alternative, Table S-2. The DEIS is confusing in its portrayal of the no action alternative as resulting in a 22 percent reduction in modeled brown bear carrying capacity when the Forest Service's proposed alternative results in a

28.6

Response to Comment 28.3

The development on the private land at Cascade Point is not considered a connected action as defined in 40 CFR 1508.25 (1) since Goldbelt, Inc. would likely develop their property with or without authorization of a Forest Service road easement. Also, Goldbelt, Inc. has other options for access that can be pursued. The Final EIS, Chapter 4, discusses possible effects from the development on private land at Cascade Point and other projects, including the Kensington Gold Project, proposed in the area.

Response to Comment 28.4

The proposed Juneau Access Improvements and the proposed Cascade Point Access road share a single alignment. However, either project could occur without the other; therefore, they are not connected actions as defined by the CEQ regulations in 40 CFR 1508.25(1).

Response to Comment 28.5

All three projects, Cascade Point Access Road, Juneau Access Improvements and the Kensington Gold project, are discussed in the Final EIS in Chapter 4, Cumulative Effects. Although cumulative effects must be considered and discussed in all National Environmental Policy Act (NEPA) analyses, Council of Environmental Quality (CEQ) regulations do not require that cumulative actions be analyzed in a single EIS.

Response to Comment 28.6

Thank you for your comment. Tables S-2, 2-2 and supporting text in the Final EIS, Chapters 2 and 4, Wildlife have been changed to present the information more clearly. The direct impacts due to the access road construction and resulting indirect and cumulative effects from the development on private land at Cascade Point result in the following modeled habitat capability percentage reductions: Brown bear, 4%; Black Bear, <2%; Mountain Goat, <2%; and Marten, 7%. When the Juneau Access Improvements, Alternative 2 potential impacts are added to these impacts, the percentages increase to: Brown bear, 35%; Black Bear, <9%; Mountain Goat, <3%; and Marten, 42%. The decision on the Juneau Access Improvements project has not yet been made.

↑ one percent reduction

If it is your intent to say that Goldbelt's development with or without road access will result in a 22 percent reduction and the road by itself will cause a one percent reduction, then the total reduction depicted for your proposed action should be 22 + 1 = 23 percent. Similar clarification or correction in the modeled carrying capacity for other indicator wildlife species also needs to be made

28.6

Cumulative Habitat Capability Percentage Reduction, Page 4-14 - 4-17. The DEIS indicates that should all the identified past, present, and reasonably foreseeable future actions in the Berners Bay area be implemented, wildlife impacts may reach the following percentages reduction in habitat capability:

brown bears:	46 percent reduction
black bears:	less than 14 percent reduction
mountain goats:	less than 7 percent reduction
marten:	61 percent reduction

28.7

I strongly oppose these wildlife population reductions, especially in light of incremental habitat reductions that are occurring throughout southeast Alaska. I request that the Forest Service exhibit courage and long-term vision by preserving for future generations the decision as to whether or not a road should be built on national forest land to Cascade Point.

Threat to Semi-Remote Recreation Values at Sawmill Creek. Forest Service approval of the Goldbelt Road would result in the northward extension of the unbridled recreation use conflicts for which Echo Cove has become notorious. This would jeopardize the semi-remote nature of the recreational experience one can now enjoy at Sawmill Creek and points north in Berners Bay. If the Goldbelt Road is further extended to Skagway, the economically important, existing wildland values of Sawmill Creek and the rest of the Berners Bay shoreline will be irretrievably lost. Here again, I strongly encourage the Forest Service to leave the Goldbelt Road decision to future generations by not approving upland access to Cascade Point.

28.8

Historic Sites/Cultural Resources. It not clear from the DEIS how the Forest Service intends to fulfill its responsibilities for mitigating adverse effects on historic resources under Section 106 of the National Historic Preservation Act.

28.9

Thank you again for the opportunity to comment.

Sincerely,



Response to Comment 28.7

Decreases in habitat capabilities do not necessarily equate directly to reductions in populations. The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 28.8

Thank you for your comment. Please see response to Comment 8.3.

Response to Comment 28.9

The Final EIS has been expanded to more clearly explain the impacts to cultural resources. The only cultural resources which are anticipated to be directly impacted are a small midden site and culturally modified trees located on Goldbelt, Inc. private land. Goldbelt, Inc. has committed in a written letter to the Forest Service to conduct mitigation on this site for interpretive purposes. This will insure that responsibilities under the National Historic Preservation Act have been met.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

February 9, 1998

Ms. Jennette de Leeuw
Juneau Ranger District
U.S. Forest Service
Tongass National Forest, Alaska Region
8465 Old Dairy Road
Juneau, Alaska 99801

Dear Ms. de Leeuw:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Cascade Point Access Road. The National Marine Fisheries Service (NMFS) offers the following comments.

Alternative A - No Action

A road constructed completely on Goldbelt land and included in the DEIS as the No Action Alternative is actually another build alternative, albeit one that does not involve U. S. Forest Service (USFS) land. Presenting this alignment as "No Action" is misleading and eliminates from consideration an alternative of no human action, which presents the least environmentally damaging option with which to compare other "action" alternatives.

Further, we believe that the assumption that development of a road at Cascade Point closer to the beach without a USFS easement is "reasonably foreseeable" is simplistic and does not recognize the negative environmental, social and technical consequences that would likely foster opposition to such a plan. Such an alignment would not be consistent with the Alaska Coastal Management Program (ACMP) or the City and Borough of Juneau (CBJ) Comprehensive Plan guidelines to preserve as Public Open Space valuable public lands and wildlife habitat including shorelines along Lynn Canal. In addition, the DEIS indicates that storm water control of a road so near the water would be expensive and possibly infeasible. In any event, such discussions of a road completely on Goldbelt property along the beach should be presented as another alternative, if at all and not as a "No Action" alternative.

29.1

29.2

RESPONSES TO COMMENTS

Commentor No. 29: Steven T. Zimmerman, National Marine Fisheries Service

Response to Comment 29.1

The Proposed Action in this EIS involves a road easement to access private land at Cascade Point. It is likely that construction of the road will lead to further indirect effects as some level of development occurs at Cascade Point in the future. The No Action Alternative discussions have been clarified in the Final EIS. Under the No Action Alternative, the Forest Service would not issue an easement to Goldbelt, Inc. for a road across National Forest System land. This is described in Chapter 2, Alternatives. Two possible consequences of this alternative would be that Goldbelt, Inc. would not construct a road to develop their property or they could pursue access not involving National Forest System lands. Goldbelt, Inc. has indicated in writing that they will pursue road access on the beach not involving National Forest System land if the No Action Alternative is selected. See the Final EIS, Chapter 4, Environmental Consequences for a discussion on consequences.

Response to Comment 29.2

Please see response to Comment 28.2



Please include the NMFS in your list of consulting agencies. NMFS will comment on the Corps of Engineers Permit for this project in accordance with provisions of the Fish and Wildlife Coordination Act. In addition, the USFS must consult with NMFS, pursuant to the Endangered Species Act, for those threatened and endangered species under our jurisdiction that may be impacted by the project.

29.3

Page 2-2, Alternatives Eliminated from Detailed Study

An alternative labeled as "Access road close to beach" is mentioned in this section as one that would use more Goldbelt land and fill less wetlands. The reason for eliminating this alternative is not given. This alternative should be more fully discussed in the DEIS and include the reason it was eliminated from consideration.

29.4

The "Access road using no National Forest System land" is given in this section as another alternative, eliminated because it would involve tideland fill. This alternative is also being presented as the "No Action Alternative" as discussed previously. This makes the DEIS confusing.

29.5

Pages 3-5 to 3-8, Wildlife

Although this project proposes intertidal fill in Echo Cove for a log equipment transfer bulkhead and staging area to be constructed concurrent with the road, this section makes no mention of marine mammals. Berners Bay and Echo Cove are utilized by numerous marine mammal species, particularly in the spring as the feed on fisheries resources of the area including herring and eulachon. These species include humpback whales, killer whales, harbor porpoise, harbor seals, and Steller sea lions. The humpback whale and Steller sea lion are listed as endangered and threatened under the Endangered Species Act, respectively. Because of the herring spawning habitat and human disturbance impacts expected from the intertidal facility, NMFS recommends that an Endangered Species Act Section 7 consultation be initiated to determine the impacts of this project to species under our jurisdiction.

29.6

Page 3-8 & 4-17, Fish

The National Marine Fisheries Service consulted with the Alaska Department of Fish and Game (ADF&G) regarding herring stocks in the vicinity of the project. Berners Bay is now the focal point of a remnant stock of herring that supported a commercially viable fishery in the 1970s. This fishery was located in the area from Auke Bay to Berners Bay and ranged in catch from about 300 to 1,000 tons annually. Stocks have declined since 1982 (2-5 million pounds since 1983) and have remained below commercially viable levels of 10 million pounds. Shoreline development between Auke Bay and Berners Bay has significantly decreased the available spawning habitat and heightens the importance of spawning habitat in Berners Bay.

29.7

Response to Comment 29.3

In the Final EIS, Chapter 1, Other Laws and Permits, we have added the NMFS to the list of consulting agencies. On April 3, 1996 Art Dunn from Dunn Environmental Services spoke with Cindy Hartman of NMFS during scoping for this project. NMFS had no comment. Documentation of this discussion is in the planning record.

Response to Comment 29.4

Please refer to the new discussion in the Final EIS, Chapter 2, Alternatives Eliminated from Detailed Study.

Response to Comment 29.5

Please see response to Comment 29.1.

Response to Comment 29.6

The U.S. Army Corps of Engineers (COE) will be responsible for issuance of the permit for Section 10 of the Rivers and Harbors Act of 1899 for building of the road. They will be required to comply with the Endangered Species Act. COE has indicated to the Forest Service that they will fully consider the National Marine Fisheries Service recommendation for Section 7 consultation if raised in response to the project described in the COE public notice.

Response to Comment 29.7

The Corps of Engineers will be conducting their own analysis for their permit. Your comment has been forwarded to them. This information is not needed for the road easement located on uplands.

29.7 The DEIS identifies herring spawning areas within 200 yards of Cascade Point and potential herring spawning habitat in the immediate vicinity of the log and equipment transfer bulkhead. This habitat could be used by herring now and in the future as stocks recover. The DEIS claims the bulkhead would "presumably not impact future spawning activities of Pacific herring". We do not agree with this statement for two reasons. First the DEIS makes no mention of an in-water work timing restriction to avoid short term impacts to herring spawn from construction activity. Any activity water-ward of the high tide line should not occur during the period March 15-May 31. Second NMFS believes that there would be long-term impacts of permanent fill for the log and equipment transfer bulkhead in potential herring spawning habitat, which is needed to maintain and recover this population to commercially viable levels. In addition, the long-term affects to marine mammal populations, including the threatened Steller sea lion and endangered humpback whale need to be assessed.


29.8 Finally, the DEIS should examine alternatives to a permanent structure for log and equipment transfer. Helicopter and barge operations, or temporary ramps should be considered and presented in the DEIS.

Page 4-7 to 4-8, Wetlands

29.9 The DEIS states that wetland fill is unavoidable for Alternative B, the preferred alternative. Mitigation options for wetland fill should be discussed in detail in the DEIS.

If you have any questions regarding these comments please contact Linda Shaw of my staff at (907) 586-7510.

Sincerely,


Steven T. Zimmerman, Ph.D.
Assistant Administrator
for Habitat Conservation

Response to Comment 29.8

Please see responses to Comments 29.6 and 29.7.

Response to Comment 29.9

The Final EIS, Chapter 2, Mitigation discusses mitigation for wetlands along the road alignment. Please see the Final EIS, Chapters 3 and 4 for discussions on wetlands in the area and potential impacts to wetlands from the proposed project. U.S. Army Corps of Engineers (COE) will determine the appropriate and practicable mitigation for unavoidable impacts to wetlands.

LRShaw:02-04-98

file: h:\wpdoc\cascade.wpd

cc: EPA Anchorage
ACOE, ADEC, AADGC, ADF&G, ADNR, USFWS, Juneau



RESPONSES TO COMMENTS
Commentor No. 30: Mark and Patti Rorick, Sierra Club Alaska Chapter

Cascade Point Access Road Comments
Juneau Group of the Sierra Club

To: Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

From: Juneau Group of the Sierra Club
3340 Fritz Cove Road
Juneau, Alaska 99801

Re: Cascade Point Access Road

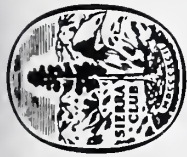
Date: February 4, 1998

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Juneau Ranger
District

"Not blind opposition to progress, but opposition to blind progress"



Index of Response to Cascade Point DEIS

Section 1 - Summary

Section 2 - Impacts to Wildlife

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Appendix - Bruce Baker - Potential legal issues and violations of State and Federal

Statutes

"Not blind opposition to progress, but opposition to blind progress"

SUMMARY

1. It is our position that the Cascade Point Access Road Draft Environmental Impact Statement is so deficient in its study of the impacts to wildlife and current recreational use on adjacent lands that we are left with no choice but to oppose alternatives B and C.
2. The extent of Goldbelt's plans for Cascade Point both short term and long term threaten Berners Bay's populations of moose, wolf, humpback whale, sea lion, harbor seal, and migratory birds. None of these species were studied in the DEIS.
3. Historical sites in the Sawmill creek area were not considered in the DEIS. The DEIS states that the outcome of Goldbelt's Cascade Point development will increase use of the Sawmill Creek area. In light of this, the impacts to this site should have been studied.
4. The DEIS does not consider subsistence use on adjacent lands in Berners Bay because Juneau is not classified as a rural community. Regardless of Juneau's classification, there are subsistence users in Juneau and outlying areas. The potential for Goldbelt's development to affect these subsistence activities should be considered.
5. When the DEIS assumes that Goldbelt will build a road, even if the Alternative A "no action" option is selected, they have unreasonably weighted Alternative A with adverse impacts. There is no guarantee that a state tideland lease would be granted. If it was granted, it would only be after a new DEIS was prepared that addressed the impacts of the new alignment and the impacts on adjacent lands.

Response to Comment 30.1

Please refer to specific comment responses that follow.

Impacts to wildlife in Berners Bay from a project that includes dormitories, an RV park, apartment complexes, duplexes, store, gas station, and potentially 500 residents in the first stage alone will be significant. That the DEIS doesn't address the impacts to the wildlife populations that are at the most risk of being driven from their habitat is a serious fault. Species such as moose, wolf, and humpback whale should have been considered. The impacts on seal and sea lion haul out areas from increased access should also have been studied. There are comments from experts found in the Juneau Access Project DEIS in support of this position. Nevin Homberg, Field Supervisor for the US Fish and Wildlife Service, says in his memo to DOT, "Humpback whales feed in Berners Bay. Alternatives which have a ferry terminal/activity in Berners Bay will disturb and may drive the humpback whale from the area." He also states that, "Any alternative that requires a road or ferry terminal in Berners Bay would affect either the eulachon run or those using it." Those using it are not only the humpback whale but the Stellar Sea lion, harbor seal, and bald eagle. Goldbelt's plans for Cascade Point include a high speed ferry terminal. The effects of such a terminal on the above species should have been studied along with the increase in access the project would provide. According to the Juneau Access DEIS, the effects on the "small and isolated" moose population from increased access could be elimination of the entire herd due to poaching and other sources of "human induced mortality." Wolf and goat are also species bound to be affected by the existence of a 500 or more person village in Berners Bay. Just as they have been affected by every extension of the current road system. So much so, in fact, that goat hunting has been closed on the Juneau road system for years. All, or at least some of these Berners Bay species should have been considered in the Cascade Point DEIS in light of the size of Goldbelt's planned projects and their dependency on Goldbelt getting road access either from the Forest Service or from a state tideland lease.

Response to Comment 30.2

Please see response to Comments 11.5 and 29.6. It is highly unlikely that the Cascade Point Access Road project would have any negative impacts on the Berners Bay moose herd. If constructed, the Juneau Access Improvements road to Skagway may cause impacts to the herd due to direct impacts to moose habitat in Berners Bay. The Cascade Point Access Road would not provide this sort of access or possible impacts. Please see the Final EIS, Chapter 4, Wildlife, for a discussion on possible impacts to mountain goats.

Wolves were used as a management indicator species in the 1997 Tongass Land and Resource Management Plan. They were not used in this project analysis because a major portion of the management indicator species model is based on deer habitat capability. This area does not support a deer population that would influence the local wolf population. For this reason, we did not have an existing model that would work for this project. Because wolves have such a large home range and use such a variety of habitats, a project that would result in three additional miles of road adjacent to a highly used recreation site would not likely result in impacts to the local wolf population.

IMPACTS TO RECREATIONAL ACTIVITY

The DEIS understates the potential impacts to current recreational use of Berners Bay resulting from Goldbelt's planned developments. The adjacent lands in Berners Bay are congressionally mandated Lud II lands, designated for special management because of their critical importance for fish and wildlife habitat and their high value to tourism and recreation. They are currently heavily used by Juneau citizens for wilderness and semi-wilderness recreation. High speed ferries and mine shuttles constantly plying the waters of the bay, disturbing the marine mammals as they go, will destroy the ability of Juneau residents to enjoy a wilderness experience in Berners Bay. Approving the Cascade Point Road will likely result in Goldbelt Corporation implementing their long term plans for the construction of an even larger community in Berners Bay, making it impossible for the Bay's Lud II lands to be managed for their wilderness and semi-wilderness values. The increased pressure on Sawmill Creek and lands further up in the Bay by residents of Goldbelt's planned community is likely to include ATV use. As the DEIS notes, all mitigation measures heretofore tried have proven inadequate to stop illegal ATV use on the current road system. This will result in the kind of destruction of wetlands and harassment of wildlife in Berners Bay that can already be seen at Eagle Beach and Echo Cove, resulting in diminished opportunities for wilderness wildlife viewing. Residents of Juneau who currently use Berners Bay for sport hunting would also find themselves at a disadvantage to the residents of Goldbelt's development who would likely use the game resources to their maximum carrying capacity by themselves. The DEIS does not address any of these issues adequately and does little but mention increased litter and bear-human contact at Sawmill Creek. This is woefully inadequate considering the value Juneau residents put on the current recreational uses at Berners Bay. The Cascade Point road's effect on Goldbelt's ability to develop a larger community in Berners Bay should not be minimized by saying Goldbelt will find another way to gain land access. There is no guarantee of that and therefore the DEIS should have

30.3

30.4

30.5

30.6

Response to Comment 30.3

Please see response to Comment 4.1. The Forest Service does not have jurisdiction over activities on private land.

Response to Comment 30.4

Off Road Vehicle (ORV) use on National Forest System land is managed under the current Juneau Ranger District ORV plan. Since this area is currently open to ORVs, use in the area would not be illegal. That designation will not change under this proposal. Direct ORV access from Cascade Point is unfeasible due to topography. ORV access via a skiff is currently low and may increase due to increased population from the development at the Cascade Point. It is not possible to quantify the amount of increase.

Response to Comment 30.5

Please refer to response for Comment 9.1. The Alaska Department of Fish and Game has responsibility for game regulations. If wildlife populations are impacted by increased hunting, the regulations may be changed. Current City and Borough of Juneau regulations prohibit shooting within one-half mile of roads. The majority of Goldbelt, Inc.'s property is within one-half mile of the proposed road easement. Future residents living at Cascade Point will be City and Borough of Juneau (CBJ) residents with the same right to use game resources as any other resident.

Response to Comment 30.6

The Final EIS, Chapter 4, discloses the potential effects from Goldbelt, Inc.'s proposed development both as an indirect effect of the road construction and as a cumulative effect. In response to comments on the Draft EIS, Goldbelt, Inc. was asked by the Forest Service to clarify their intent should the No Action Alternative be selected. Goldbelt has verified in writing that they would pursue construction of a road on private land along the beach under Alternative A - No Action. Therefore, if this should occur, it is reasonable to assume that the development at Cascade Point is likely to be the same under Alternative B, the Proposed Action.

↑ addressed a more thorough study of all the potential impacts on current recreational uses of Berners Bay. Instead, the authors of the study have continually claimed that it is unnecessary to consider potential impacts because these impacts would happen whether alternative B is selected or not selected. This is faulty reasoning. All impacts reasonably foreseeable from the Cascade Point road and resulting development on Goldbelt property should be considered.

IMPACTS TO SUBSISTENCE

The DEIS in its treatment of subsistence as a non-issue, and not worthy of consideration, ignores traditional use by native Americans and personal subsistence use by residents of Juneau and other Northern Lynn Canal Residents. The Juneau Access DEIS states in section 4.1.5 that "Juneau has a large Native population, most of whom participate in subsistence activities." The authors and sponsors of the Cascade Point DEIS in their apparent desire to consider as few of the potential impacts from their development as they can get away with, are doing a grave disservice to their own shareholders, the general population of Juneau, and the other communities of Northern Southeast Alaska. Without a study of the potential impacts to the real subsistence activities that occur on adjacent lands, it is impossible to design mitigation measures. The DEIS does, however, state that Goldbelt's developments would impact habitat that accommodates herring spawning. As anyone who has lived in Juneau for the last 20 years knows, the herring runs on the current road system have been disappearing over the years. Residents used to be able to scoop herring and their roe up with buckets at the site of Auke Bay ferry terminal but this hasn't happened for years now. Is this what awaits the prime spawning grounds in Berners Bay? Quite possibly it is, considering the size of Goldbelt's planned developments when they gain access via the proposed road. Using the technicality of Juneau not being classified as a rural community to escape the responsibility of addressing real impacts to real users also ignores the fact that other projects in the Juneau area have been modified because of concerns about impacts on traditional and subsistence use. The recent abandonment of a planned facility for NOAA at Inian Point is an example of

this

Response to Comment 30.7

Please see the Final EIS, Chapter 4, Subsistence for an expanded discussion which acknowledges that all alternatives would likely result in increased personal use activities in the project area and that, in time, densities of some species may be reduced to the point where harvest efficiencies may decrease.

Response to Comment 30.8

Please see response to Comment 29.7.

Response to Comment 30.9

Each project is different and is treated on a case-by-case basis in relation to issues and analysis.

The archeological survey along the proposed access alignment conducted for this DEIS is inadequate. The effects on cultural sites in the Sawmill Creek area from a year-round community at Cascade Point, made possible by the selection of Alternative B, have not been addressed. Given the nature of Goldbelt's long term plans for their property if they are granted land access via this road or a state tideland lease, a complete archeological survey of the entire Berners Bay area should be undertaken and mitigation measure designed where necessary. Until such a survey is completed, no access should be granted via federal or state lands.

Response to Comment 30.10

The Forest Service reviewed the archeological survey conducted along the road corridor and determined it to be adequate. A research design was developed by a consulting archeologist and was reviewed by both the Chatham Area Archaeologist and the Alaska Office of History and Archaeology. Both found the design to be a procedurally acceptable method for survey practice. Permission to conduct an archaeological survey was not given until this research design had been submitted and approved.

The historical sites at Sawmill Creek were not considered in the Draft EIS primarily because of the distance from the project site. The Cascade Point Development is well over one mile from the closest historical site at Sawmill Creek. This distance has been found in past project determinations with SHPO to provide sufficient protection. Therefore, there would not be an effect on an archeological site separated from a project by this distance, and no formal Determination of Effect would be required for any of these sites.

The Final EIS has been expanded to consider the effects the projects may have on any archeological sites in the Sawmill Creek area. To conduct a complete archaeological survey of the entire Berners Bay area if either a state tideland lease be given or the land access granted is beyond the scope of this project. It is extremely difficult to measure the impacts the development may have on Berners Bay. Surveys have been completed per a State approved research design. For this particular resource, should a state tideland permit be granted, this State Agency would not be required under the National Historic Preservation Act to pursue further impacts nor would it be responsible for conducting complete surveys of Berners Bay.

CONCLUSION

The Juneau Group of the Sierra Club supports Alternative A, the no action option. The impacts to sensitive wildlife populations including, but not limited to, moose and wolf and to critical habitat areas on adjacent Lud II lands have not been adequately studied. The DEIS wrongly assumes that large scale development will happen at Cascade Point whether the proposed road is built or not. Impacts to subsistence use and to cultural sites have not been addressed. For these reasons alone the DEIS should be re-done. The admitted impacts to current recreational use of adjacent areas in Berners Bay are understated but still sufficient to prohibit the Forest Service from facilitating the construction of a larger community at Cascade Point. We believe the current marine access is adequate to meet the needs of Goldbelt Corporation to reasonably develop their property. As a side issue, we note with interest that Goldbelt apparently would not provide access through their property for the Forest Service without receiving other land in return. Now Goldbelt wishes a road built for their exclusive benefit on the land they traded away. We would like to know what lands Goldbelt received for the right of way and whether they are willing to deed them back to the public. The Juneau Group also notes that the National Environmental Policy Act may have been violated when the Juneau Ranger District and Goldbelt pre-selected an alignment without public participation and thereby restricted the DEIS in its selection of alternatives.

30.11

30.12

30.13

Response to Comment 30.11

Please refer to responses to Comments 30.2-30.10. Thank you for your comment.

Response to Comment 30.12

The Final EIS, Chapter 1, Background contains a brief description of the land exchange involving the road corridor. The details that you requested are outside the scope of this EIS. We will provide that information to you in a separate letter.

Response to Comment 30.13

Please refer to response to Comment 11.3.

Sincerely
Mark and Patten Rorick
ROSS Men. Pen Rd.
Juneau, AK 99801

245 Behrends Ave.
P.O. Box 1
Juneau, AK 99802
January 30, 1998

Jennette de Leeuw
Juneau Renger District
8465 Old Dairy Road
Juneau, AK 99801

I would like to offer my support of the Goldbelt, Incorporated Proposed Action, to build a 2.5 Mile Access road to Cascade Point "Proposed Action B", the Forest Service Preferred Alternative.

I am not a member of Goldbelt, Inc. but I believe they have continued to demonstrate a commitment to quality in every endeavor they have initiated. Furthermore the following are specific reasons I support this project:

- Construction of the proposed access road and potential Cascade Point development is consistent with the CBJ Comprehensive Plan adopted in 1984.
- Goldbelt Echo Cove lands are designated "New Growth Area" and CBJ policy has been to encourage development in this area for at least the next 14 years.
- Overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove since only some 10 percent of the private land area is proposed for development.
- Except for the road alignment owned by the U.S. Forest Service, this proposed development should not be unreasonably restricted for this private property project.
- The U.S.F.S. road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- Development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.
- Project impacts have been identified and thoroughly addressed.
- Mitigation proposed for the identified impacts is appropriate and responsible.

Thank you for your consideration of my support for this project.


Donn Liston
907-463-3826

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Juneau Regional Office

Response to Comment 31.1

Thank you for your comment.

Response to Comment 31.2

Please refer to response to Comment 14.2

Response to Comment 31.3

Please refer to response to Comment 14.4.

Response to Comment 31.4

Please see the response to Comment 22.5.

Response to Comment 31.5

Please refer to response to Comment 14.3

Response to Comment 31.6

Please refer to response to Comment 14.1

Response to Comment 31.7

Thank you for your comment.

SCOTT V. SPICKLER

10754 Horizon Drive
Juneau, AK 99801

Home: (907) 586-4718
Business: (907) 789-3780
Fax: (907) 789-9800

February 2, 1998


Jeanette de Leeuw
Juneau Ranger Station
8465 Old Dairy Rd.
Juneau, AK 99801

I would like to voice my support for the Goldbelt, Inc. "Proposed Action B" alternative for their road building project.

This proposed project is primarily on private property and should not be restricted or delayed by the federal government in any way. The impacts of this 2.5 mile road have been identified, addressed, and will be responsibly mitigated by Goldbelt.

Thank you.

Sincerely,


Scott V. Spickler
10754 Horizon Drive
Juneau, AK 99801

Response to Comment 32.1

Thank you for your comment.

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Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 32: Scott V. Spickler

RECEIVED 2/3/98

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Juneau Ranger
District

Janette DeLoe

*I support the debt Mr. [unclear] proposed
action in building 2.5 miles of access
road to Grand Point "Bogus" action
B" of the Forest Service Proposed Alternative.*

Response:

1. Consistent with the COF Guidelines

Plan of 1984.

2. Forest watershed re designated as

"New Shaded Area" in the Guidelines

Plan.

*3. Only about 10% of the land is scheduled
for development.*

*4. A high percentage of the land is
private and should not be unnecessarily
segregated.*

*5. Management of Forest Point is not possible
efficient manner. Transportation*

*6. The project is appropriate and reasonable
for the area.*

Respectfully submitted,

Janette DeLoe

9349 Elder Ct.

Juneau, AK 99801

RESPONSES TO COMMENTS
Commentor No. 33: Les V. Spickler

Response to Comment 33.1

Thank you for your comment.

Response to Comment 33.2

Please see the response to Comment 14.2

Response to Comment 33.3

Please see the response to Comment 14.4

Response to Comment 33.4

Please see the response to Comment 22.5:

Response to Comment 33.5

Please see the response to Comment 14.1.

Response to Comment 33.6

Please refer to the Forest Service Record of Decision for the selected alternative and the rationale for the decision.

RESPONSES TO COMMENTS
Commentor No. 34: Peter Jon Gillquist

February 4, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Jennette,

Greetings from downtown Juneau. I hope this short but very sincere letter finds you well.

I am writing to voice my support for Proposed Action B. It seems ridiculous that Goldbelt should own such a valuable, beautiful piece of land and not be allowed to access it by road. Absence of an access road would seem to unreasonably restrict their development of private property. I hope they will be allowed to build one.

Thank you so much for your time.

Your Neighbor,



Peter Jon Gillquist
PO Box 22066
Juneau, AK 99802

RECEIVED

FEB 05 1998

Juneau Ranger
District

Response to Comment 34.1

Thank you for your comment.

RECEIVED
CASCADE POINT ACCESS ROAD
DRAFT EIS

FEB 05 1998

Juneau Ranger
District

COMMENT FORM

Juneau Ranger District, USDA Forest Service in cooperation with the US Army, Corps of Engineers have prepared a Draft Environmental Impact Statement (DEIS) that presents the environmental analysis of Goldbelt, Inc.'s proposal to extend Glacier Highway north for approximately 3 miles to Cascade Point. Your comments on the DEIS and the proposal are welcome and are due by Feb. 9, 1998.

If you are not currently on the mailing list, and would like to be kept informed about this proposal, please print your name and address in the space provided below. Thank you for your time and participation in this project! This form can be filled in thirds, with the Forest Service address on the other side showing, and mailed back to the Forest Service, if desired.

For further information about this project, you can also contact Jannette da Leeuw at the Forest Service at 586-8800 between 8:00 am and 5:00 pm weekdays.

NAME: Mark Rorick

ADDRESS: 1055 Menem Rd.

Juneau, AK 99801

- 35.1 COMMENTS: I believe that the Cascade point DEIS
is inadequate in its study of impacts to the
adjacent bed II lands in Barren Bay. At risk populations
of moose and wolf should have been studied. Cultural
sites at Summit Ct should have been studied and
mitigation measures designed. The DEIS wrongly assumes
that the same level of development will occur at
Cascade Point even if the proposed road is denied.
This wrongly weights the no action alternative with
adverse impacts and serves as an excuse for not
doing the necessary work to determine potential impacts.
NEPA may have been violated when the road alignment
was pre-selected. For these reasons and others, I
favor alternative A, the no-build option
- 35.2
- 35.3
- 35.4
- 35.6

RESPONSES TO COMMENTS
Commentor No. 35: Mark Rorick

Response to Comment 35.1

Please refer to response to Comment 4.1.

Response to Comment 35.2

Please refer to response to Comment 30.2.

Response to Comment 35.3

Please refer to response to Comment 30.10.

Response to Comment 35.4

Please refer to response to Comment 29.1.

Response to Comment 35.5

Please refer to response to Comment 11.3. Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 36: Betty and Matt Seguin and Sarah Asper-Smith

February 5, 1998

Jenette de Leeuw
USFS, Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

We are opposed to the Forest Service issuing road easement special permits to Goldbelt, Inc to build a road to Cascade Point. We support alternative A, no action on the proposal.

We are concerned about the impact to wildlife and to the Berners Bay recreation area which would result from vehicular and increased foot traffic. We are also concerned about the additional impact of subsequent development in the area.

Response to Comment 36.1


The Forest Service Record of Decision provides the rationale for the selected alternative.


Response to Comment 36.2

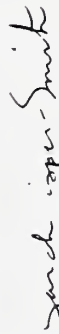
The Final EIS, Chapter 4, Cumulative Effects, Wildlife and Recreational Activities discusses possible effects from projects proposed in the area.

Response to Comment 36.3

Please refer to response to Comment 11.4.


Betty Seguin
8186 Threadneedle
Juneau, AK 99801


Matt Seguin
8186 Threadneedle
Juneau, AK 99801


Sarah Asper-Smith
137 6th Street
Juneau, AK 99801

RECEIVED

FEB 06 1998

Juneau Ranger District

February 9, 1998

Jeanette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. de Leeuw:

This letter is in regards to the Cascade Point Access Road Draft Environmental Impact Statement. I would like to comment on the impacts of the proposed road and state my favor for Alternative A.

First, I would like to comment on the apparent violation of the National Environmental Policy Act. The decision to align the road from Echo Cove to Goldbell's property was an agreement made between the Forest Service and Goldbell outside the public process. With the given alternatives being either to build the road or not, there is a lot of private interest at stake for the road, as evidenced by the Forest Service's Preferred Alternative. With the proposed road overlying the same route in the Juneau Access DEIS, could this be the first 2 1/2 miles of pavement to Skagway?

The road to access private property at Cascade Point is the link to a much larger picture of human encroachment in Berner's Bay. Goldbell is planning a small (to start with) town at the end of the road. If Alternative A were selected, most likely Cascade Point would not feel the effects of a gas station or miner's barracks, or a post office. However, for Alternatives B and C, the Forest Service needs to consider the effects of the road and a town, not simply a road. The issues at stake are habitat for wildlife, recreational use, and fisheries. As for myself, I value the Berner's Bay area for its serenity and wild character experienced from my kayak. Right now, Echo Cove is a wonderful spot to be located at the end of the road. Let us keep it that way. Even if the proposed road corridor is not used much by hikers that does not mean the area is not valued as a recreating spot. Much of the enjoyment had in the area comes by means of a boat or kayak. Overuse and accessibility would desecrate Sawmill Creek. Not to mention its importance as bear habitat.

Slowly, we are bisecting the Berner's Bay area with development. Six futuristic projects in the watershed have the potential for roads, power lines, machinery, etc. All for what? Does not the value of something go up as its amount diminishes? More precious than anything is our wild land. Daily, the amount chips away until someday someone notices. Then it is too late. Brown bear will be gone, by 46% in Berner's Bay if projects come into

Response to Comment 37.1

The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 37.2

Please refer to response to Comment 11.3.

Response to Comment 37.3

Please refer to response to Comment 11.4.

Response to Comment 37.4

The Final EIS, Chapter 4, Cumulative Effects, Wildlife and Recreational Activities discusses possible effects from projects proposed in the area.

Response to Comment 37.5

Thank you for your comment. Please see response to Comment 24.1.

37.1

37.2

37.3

37.4

37.5

↑ fruition. Before any more mines come on-line or roads built, the Forest Service must address the affects all of these projects will have on the Berner's Bay watershed in its entirety.

Sincerely,

Anissa Berry-Frick

P.O. BOX 210035 • AUKE BAY, AK • 99821
PHONE: (907) 789-6360 • FAX: (907) 789-6988

International Union of Operating Engineers

BRANCHES A, B, C, D, RA & O

LOCAL 302
AFL-CIO

Clyde J. Wilson, Business Manager
Jack Jakubiec, Financial Secretary
Ron Knight, President
Mike Jonas, Vice President

Branches:
E. Wenatchee, Washington
Yakima, Washington
Anchorage, Alaska
Fairbanks, Alaska
Juneau, Alaska



214 N. Franklin Street
Juneau, Alaska 99801
ph 907-586-3850
fax 907-463-5464

Main Office
Bothell, Washington

L. Dale Reid
District Eight Representative

February 9th, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. de Leeuw:

We, at the International Union of Operating Engineers - Local #302, are in support of the Goldbelt, Inc. proposed action of building a 2.5 mile access road to Cascade Point. We are in support of "Proposed Action B" ...the Forest Service preferred plan.

We, along with the City and Borough of Juneau, have encouraged development of the Echo Bay Cascade Point area for years. The lands at Echo Bay Cascade Point are private lands and we feel the U.S. Forest Service should provide road alignment access available so these properties can be developed. There are many options available to improve the lifestyle of people in the Lynn-Canal corridor with the development of these lands. We feel that the project impacts have been identified and thoroughly addressed and that the mitigation proposed for the identified impacts is appropriate and responsible.

Therefore, we are in support of the 2.5 mile access road to Cascade Point through U.S. Forest Service land. We support "Proposed Action B" as the preferred alternative.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Dale Reid".

L. Dale Reid, District Representative
I.U.O.E. Local #302 - District #8

LDR:d1c

100-100-100-100

FFA 00

RESPONSES TO COMMENTS
Commentor No. 38: L. Dale Reid, International Union of
Operating Engineers

Response to Comment 38.1

Thank you for your comment.

International Brotherhood of Electrical Workers
Local 1547

124 Front Street
JUNEAU, ALASKA 99801

TELEPHONE
(907) 586-3050

FAX
(907) 586-9614

GARY BROOKS
BUSINESS MANAGER - FINANCIAL SECRETARY

KNUTE ANDERSON
PRESIDENT



RESPONSES TO COMMENTS
Commentor No. 39: Michael J. Notar, International Brotherhood of
Electrical Workers

RECEIVED

FEB 06

Juneau, Alaska

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

February 3, 1998

Dear Ms. de Leeuw,

The International Brotherhood of Electrical Workers, Local 1547 in Juneau would like to express our support for the Goldbelt Inc. building of a 2.5 mile access road to Cascade Point. Specifically, we endorse the Forest Service Preferred Alternative "Action B".

39.1

Only a small percentage of the private land would be developed, and it fits nicely into the City and Borough of Juneau's Comprehensive Plan for new growth. It seems that the road right of way through Forest Service land is imminent anyway for access and development in the area. We feel that the impacts are minimal and have been appropriately addressed.

Thank you for your consideration.

Sincerely,

Michael J. Notar
Assistant Business Manager

Response to Comment 39.1
Thank you for your comment.

Julie Hammonds Penn
6731 Marguerite Avenue
Juneau, AK 99802
(907) 789-8302

RESPONSES TO COMMENTS
Commentor No. 40: Julie Hammonds Penn

February 8, 1998

Ms. Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RECEIVED

FEB 09 1998

Juneau Ranger
District

Re: Goldbelt Road to Cascade Point

Dear Ms. de Leeuw:

I have been a land use planner since I graduated from the University of California with a degree in natural resources planning in 1988. In the course of my duties I have written land use plans and environmental impact statements for city comprehensive plans, and have studied many issues concerned with the growth of cities.

Here's how the process is supposed to work. When a pristine area is contemplated for development, an objective person studies the area and determines its natural qualities, setting aside for protection areas of critical habitat or particularly high scenic or recreational value. Then a development plan is written for the area, taking into account the area's natural values. Once the plan is complete, the community whose growth is driving the planning processes assesses the proposed development and its impacts, discussing these at community forums. The community itself decides what impacts are acceptable to it, balancing protection of environmental values with reasonable and responsible development that serves its needs.

What is happening in Berners Bay is completely wrong. Piecemeal development of an area with incredibly high natural, scenic and recreational values is the Anchorage model of development. Surely we know better, here in Southeast! If we are going to develop Berners Bay to serve Juneau, the people of Juneau should drive the process, not Goldbelt Corporation. And the people of Juneau should be allowed to look at the "big picture" for development in the Bay, weighing the need for growth against the need to conserve the values of an area that many of us deeply love.

How many mines, how many roads, how many campgrounds, how much development will be permitted, before somebody steps forward and says "Okay, now it's time to

Response to Comment 40.1

The process you are describing here has been done through the Tongass Land and Resource Management Plan process. Please see the Forest Plan for the Tongass National Forest, Chapter 1.

↑ discuss how we want to develop this area"? How long will the Forest Service duck its responsibility to plan for the Bay as a whole? How long must the people of Juneau, who kayak, hike, hunt, and fish Berners Bay, hear the Forest Service say "Not yet, not now, not us"?

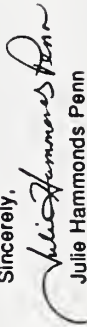
The Forest Service is responsible to the people of the United States who own most of the land at Berners Bay, and your responsibility is to consider all of the impacts of the proposed road to Cascade Point. A road is never just a road, and you are shirking your responsibility to us by allowing planning to go forward as if it were. Without this road, there will be no development at Cascade Point. With this road come the following, directly related, developments: a campground at Echo Cove, a dock, grocery and convenience stores, housing, and enough facilities to serve an entire small community.

You cannot study the road without studying the effects of directly related development. I would go further and say that this road should be studied, not just with the proposed "Goldbelt City", but with the Kensington and Jualin Mines, and with the proposed road to Skagway (yes, you could adopt the "Juneau Access" DEIS by reference in such a study, flawed though it is. I'm not asking you to reinvent the wheel.). All effects of these developments on the Lace and Antler River watersheds must be fully considered, including effects on bear and marten habitat, and recreational and hunting/fishing activities.

The entire community should decide what we will allow to occur in Berners Bay -- not a small group of agency staff, not a corporation with the bottom line at stake. Whoever makes the final decision, though, I think it should be made while sitting on the banks of Sawmill Creek in mid-August, on a sunny day when the salmon are running, and bear tracks in the sand are filled with the feathers of eagles. I would be very surprised if a person could sit in the sunshine and listen to the splash of spawning salmon, the scream of eagles and gulls, the laughter of waters, and write the words "this road is approved."

I strongly, firmly oppose the proposed road to Cascade Point and all of the development that is directly related to it. I especially oppose the piecemeal destruction of Berners Bay and the uncoordinated planning efforts for the mines, the road to Skagway, and Goldbelt City. If Berners Bay is going to be destroyed, please do the people of Juneau the favor of disclosing this fact beforehand rather than wringing your hands afterward and saying "there was nothing I could do." The Forest Service owes us a full and honest disclosure of the proposed destruction of our beloved Bay. Tell us the truth -- and let the people decide.

Sincerely,


Julie Hammonds Penn

Response to Comment 40.2

Please see the Final EIS, Chapter 4, Cumulative Effects, for a discussion on the potential effects from projects proposed in the area. This EIS incorporates by reference applicable analyses and data from the Final EIS for the Kensington Gold Project, the Draft EIS for the Juneau Access Improvements project, and previous environmental analysis for exploration activities at the Jualin Mine. Because other types of access to Cascade Point are available to Goldbelt, Inc., it is likely that some or all of the Cascade Point development will occur regardless of the alternative selected.

Response to Comment 40.3

The Final EIS, Chapter 1, Scoping includes a review of the public involvement process for this project. All public comments on the Draft EIS have been considered by the deciding official for the Record of Decision.

Response to Comment 40.4

The Forest Service Record of Decision provides the rationale for the selected alternative.

ALASKA STATE DISTRICT COUNCIL OF LABORERS

Laborers International Union of North America, AFL-CIO

2501 Commercial Drive, Suite 140
Anchorage, Alaska 99501 - 907/276-1640

Public Employee Local 71
Don Valesko, Business Manager
Laborers Local 942
Joe Thomas, Business Manager
Laborers Local 341
Manso Frey, Business Manager

Don Valesko
President

Andrew J. "Bear" Piekanski
Business Manager, Secretary, Treasurer

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms Leeuw

This letter is in support of Goldbelt Inc. project to build 2.5 miles of road to access Cascade Point via Proposed Action B. We are in support of responsible development projects and we see an opportunity for jobs being made available in our community. We also believe that this project is a step toward better access to Juneau.

41.1

Don Etheridge
Business Agent
Alaska District Council of Laborers

RECEIVED

FEB 03

JUN 03

RESPONSES TO COMMENTS
Commentor No. 41: Don Etheridge, Alaska State District Council of Laborers

Response to Comment 41.1

Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 42: John Caouette

Jennette de Leeuw
USFS - JRD
8465 Old Dairy Road
Juneau, AK 99801

RECEIVED

FEB 09 1998

Juneau Ranger
District

Hello Jennette,

Just wanted to let the USFS know that I am opposed to any support for road access to Goldbelt land through the Tongass Forest. The native corporations have made their land selections and have managed to make some good profit from it. In the case of Goldbelt, it is too bad that their Berner's Bay land selection did not include enough room for a road. They simply must bear that burden and live with their decisions just like everybody else. No to the road.

42.1

Sincerely,

John Caouette - 2/9/98
John Caouette

Response to Comment 42.1

The Forest Service Record of Decision provides the rationale for the selected alternative.

R E C E I V E D

FEB 09 1998

Juneau Ranger
District

February 7, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Dear Ms. de Leeuw:

I am writing to support the construction of an access road to Cascade Point by Goldbelt, Incorporated. Your approval of "Proposed Action B" would allow this to occur. The proposed development in this area fits within the Comprehensive Plan as adopted by elected officials of the City of Juneau. This project will provide our area with great long term economic benefits.

Your positive action on this matter will be greatly appreciated by most of the residents of this area.

Sincerely,



Rick Union
118 5th Street
Douglas, Alaska 99824
364-2315

Response to Comment 43.1

Thank you for your comment.



RESPONSES TO COMMENTS
Commentor No. 44: Rosita Worl, Sealaska

February 4, 1998

RECEIVED

FEB 09 1998

Jennette de Leeuw
USDA Forest Service
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Juneau Ranger
District

Dear Ms. de Leeuw:

I was born and raised in northern Southeast Alaska. I am familiar with the need to improve transportation access to and from the communities of northern Southeast Alaska.

I support the proposal by Goldbelt, Incorporated for an access road to and the potential development of Cascade Point. The access road and development is consistent with the Comprehensive Plan adopted by the City and Borough of Juneau and the Goldbelt lands are designated as a "New Growth Area" in the Comprehensive Plan.

To my knowledge, all of the project impacts have been identified and addressed. The overall growth envisioned by Goldbelt minimizes direct impacts to Echo Cove and the mitigation measures they propose are appropriate and responsible.

Overall, the private land proposed for eventual development is only about 10% of the area. Goldbelt has already demonstrated its commitment to operating responsibly in this sensitive area by its recent helicopter logging in 1997.

The development proposed at Cascade Point will enable more efficient and improved marine transportation to Skagway and Haines. This project will benefit the people of the Community of Juneau as well as the communities of northern Lynn Canal.

If this project is allowed to proceed, the Forest Service will be helping Goldbelt to fulfill the intent of ANCSA to provide responsible economic and employment opportunity for its shareholders. The development of ANCSA land should not be unreasonably restricted.

I encourage the Forest Service to issue a favorable decision for the preferred alternative for Goldbelt to build and operate an access road to Cascade Point.

Thank you for this opportunity to comment.

Sincerely,

Rosita Worl
Rosita Worl
Director, Sealaska Corporation

Response to Comment 44.1

Please see response to Comment 14.2.

Response to Comment 44.2

Thank you for your comment.

Response to Comment 44.3

Please see response to Comment 14.4.

Response to Comment 44.4

Please see response to Comment 14.1

Response to Comment 44.5

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service direction for providing access to private land.

Response to Comment 44.6

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Rd.
Juneau, AK 99801

February 8, 1998

I am writing to express my opposition to Goldbelt's proposed road to Cascade Point. The long-term impacts of the project are obviously far greater than 3 additional miles of road, and I believe these long-term impacts should be seriously considered before any permission is granted to construct this road. Berner's Bay is an invaluable resource for tourism, recreation, and wildlife, and I do not want to see those values compromised for the sake of a private corporation's profit margin.

Thank you for your consideration,

Rebecca Braun
Juneau, AK

RESPONSES TO COMMENTS
Commentor No. 45: Rebecca Braun

Response to Comment 45.1

The Forest Service Record of Decision provides the rationale for the selected alternative.

45.1

RECEIVED

FEB 09 1993

Juneau Ranger
District

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger District

46.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

46.2 The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

46.2 The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

46.3 The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development

46.4 Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

46.5 The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

46.6 The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

46.7 The project impacts have been identified and thoroughly addressed.

46.7 The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Judy Miller
ADDRESS 6737 Gray St.
CITY Juneau STATE AK ZIP 99801 TELEPHONE 907-586-4102

RESPONSES TO COMMENTS
Commentor No. 46: Judy Miller

Response to Comment 46.1

Thank you for your comment.

Response to Comment 46.2

Please see response to Comment 14.2

Response to Comment 46.3

Please see response to Comment 14.4

Response to Comment 46.4

Please see response to Comment 22.5

Response to Comment 46.5

Please see response to Comment 14.3

Response to Comment 46.6

Please see response to Comment 14.1

Response to Comment 46.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger District

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- 47.1 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- 47.2 ☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- 47.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- 47.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- 47.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- 47.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.
- 46.7 ☐ The project impacts have been identified and thoroughly addressed.
- ☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Nena S. Brantner
ADDRESS 4347 Inaba Boulevard
CITY Juneau STATE AK ZIP 99801 TELEPHONE 789-3033

RESPONSES TO COMMENTS

Commentor No. 47: Nena S. Brantner

- Response to Comment 47.1
Thank you for your comment.
- Response to Comment 47.2
Please see response to Comment 14.2
- Response to Comment 47.3
Please see response to Comment 14.4
- Response to Comment 47.4
Please see response to Comment 22.5
- Response to Comment 47.5
Please see response to Comment 14.3
- Response to Comment 47.6
Please see response to Comment 14.1
- Response to Comment 47.7
Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger
District

48.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

48.2 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

48.3 ☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

48.4 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development

48.5 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted

48.6 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

48.7 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

☐ The project impacts have been identified and thoroughly addressed.

☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Steve Brantner
ADDRESS 4347 TAKU BLVD
CITY JUNEAU STATE AK ZIP 99801 TELEPHONE 789-3033

RESPONSES TO COMMENTS

Commentor No. 48: Steve Brantner

Response to Comment 48.1

Thank you for your comment.

Response to Comment 48.2

Please see response to Comment 14.2

Response to Comment 48.3

Please see response to Comment 14.4

Response to Comment 48.4

Please see response to Comment 22.5

Response to Comment 48.5

Please see response to Comment 14.3

Response to Comment 48.6

Please see response to Comment 14.1

Response to Comment 48.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger
District

49.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

49.2 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

49.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

49.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

49.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

49.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

☐ The project impacts have been identified and thoroughly addressed.

49.7 ☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME

John J. Kato

ADDRESS

4005 Spruce Lane

CITY

Juneau

AK

99801

STATE

ZIP

789-1640

TELEPHONE

RESPONSES TO COMMENTS
Commentor No. 49: John J. Kato

Response to Comment 49.1

Thank you for your comment.

Response to Comment 49.2

Please see response to Comment 14.2

Response to Comment 49.3

Please see response to Comment 14.4

Response to Comment 49.4

Please see response to Comment 22.5

Response to Comment 49.5

Please see response to Comment 14.3

Response to Comment 49.6

Please see response to Comment 14.1

Response to Comment 49.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger District
I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- 50.1 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- 50.2 ☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- 50.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- 50.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- 50.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- 50.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.
- 50.7 ☐ The project impacts have been identified and thoroughly addressed.
- ☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Joe M. Smith
ADDRESS 1212 Denison St
CITY Juneau STATE AK ZIP 99801 TELEPHONE 586-7437

RESPONSES TO COMMENTS

Commentor No. 50: Joe M. Smith

Response to Comment 50.1

Thank you for your comment.

Response to Comment 50.2

Please see response to Comment 14.2

Response to Comment 50.3

Please see response to Comment 14.4

Response to Comment 50.4

Please see response to Comment 22.5

Response to Comment 50.5

Please see response to Comment 14.3

Response to Comment 50.6

Please see response to Comment 14.1

Response to Comment 50.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 51: Anthony Williams

51.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

51.2 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

51.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

51.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

51.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

51.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

51.7 ☐ The project impacts have been identified and thoroughly addressed.

☐ The mitigation proposed for the identified impacts is appropriate and responsible. *Anthony Williams*

NAME Anthony Williams

ADDRESS 9029 Rosedale

CITY Juneau STATE AK ZIP 99801 TELEPHONE W463-5343, H 785-2301

Response to Comment 51.1

Thank you for your comment.

Response to Comment 51.2

Please see response to Comment 14.2

Response to Comment 51.3

Please see response to Comment 14.4

Response to Comment 51.4

Please see response to Comment 22.5

Response to Comment 51.5

Please see response to Comment 14.3

Response to Comment 51.6

Please see response to Comment 14.1

Response to Comment 51.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger
District

52.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

52.2 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

52.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development

52.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

52.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

52.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

☐ The project impacts have been identified and thoroughly addressed.

52.7 ☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Robert W. Carnes
ADDRESS 3211 Pioneer Ave
CITY JUNEAU STATE AK ZIP 99801 TELEPHONE 586-4886

RESPONSES TO COMMENTS
Commentor No. 52: Robert W. Carnes

Response to Comment 52.1

Thank you for your comment.

Response to Comment 52.2

Please see response to Comment 14.2

Response to Comment 52.3

Please see response to Comment 14.4

Response to Comment 52.4

Please see response to Comment 22.5

Response to Comment 52.5

Please see response to Comment 14.3

Response to Comment 52.6

Please see response to Comment 14.1

Response to Comment 52.7

Thank you for your comment.

RECEIVED

Jeanette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1990

Juneau Ranger
District

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- o The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- o The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- o The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- o Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- o The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- o The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

o The project impacts have been identified and thoroughly addressed.

o The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Jim Akins
ADDRESS P.O. Box 240253
CITY Douglas STATE AK ZIP 99824 TELEPHONE 463-4907

Response to Comment 53.1

Thank you for your comment.

Response to Comment 53.2

Please see response to Comment 14.2

Response to Comment 53.3

Please see response to Comment 14.4

Response to Comment 53.4

Please see response to Comment 22.5

Response to Comment 53.5

Please see response to Comment 14.3

Response to Comment 53.6

Please see response to Comment 14.1

Response to Comment 53.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1990

Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 54: E. Neil MacKinnon

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- o The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- o The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- o The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- o Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- o The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- o The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

o The project impacts have been identified and thoroughly addressed.

o The mitigation proposed for the identified impacts is appropriate and responsible.

E. Neil MacKinnon
NAME

1114 Graeme Ave
ADDRESS

Juneau AK 99801 586-3494
CITY STATE ZIP TELEPHONE

Response to Comment 54.1

Thank you for your comment.

Response to Comment 54.2

Please see response to Comment 14.2

Response to Comment 54.3

Please see response to Comment 14.4

Response to Comment 54.4

Please see response to Comment 22.5

Response to Comment 54.5

Please see response to Comment 14.3

Response to Comment 54.6

Please see response to Comment 14.1

Response to Comment 54.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998

Juneau Ranger
District
Alternative for the

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

o The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

o The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

o The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development

o Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

o The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

o The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

o The project impacts have been identified and thoroughly addressed.

o The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Dr. Roger Eichman

ADDRESS Box 20765

CITY Juneau STATE AK ZIP 99803 TELEPHONE 780-4065

RESPONSES TO COMMENTS
Commentor No. 55: Roger Eichman

Response to Comment 55.1

Thank you for your comment.

Response to Comment 55.2

Please see response to Comment 14.2

Response to Comment 55.3

Please see response to Comment 14.4

Response to Comment 55.4

Please see response to Comment 22.5

Response to Comment 55.5

Please see response to Comment 14.3

Response to Comment 55.6

Please see response to Comment 14.1

Response to Comment 55.7

Thank you for your comment.

RECEIVED

Jermette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1988

Juneau Ranger
District

56.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

56.2 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

56.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

56.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

56.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

56.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

☐ The project impacts have been identified and thoroughly addressed.

56.7 ☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Robert Martin, Jr.
ADDRESS 9354 Woodward Way
CITY Juneau STATE AK ZIP 99801 TELEPHONE 748-7157

RESPONSES TO COMMENTS
Commentor No. 56: Robert Martin, Jr.

Response to Comment 56.1

Thank you for your comment.

Response to Comment 56.2

Please see response to Comment 14.2

Response to Comment 56.3

Please see response to Comment 14.4

Response to Comment 56.4

Please see response to Comment 22.5

Response to Comment 56.5

Please see response to Comment 14.3

Response to Comment 56.6

Please see response to Comment 14.1

Response to Comment 56.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1990

Juneau Ranger
District

57.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

o The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

57.2 o The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

57.3 o The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

57.4 o Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

57.5 o The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

57.6 o The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

o The project impacts have been identified and thoroughly addressed.

57.7 o The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Rosemary Hagevig

ADDRESS Box 248423

CITY Douglas Ak STATE AK ZIP 99824-0423 TELEPHONE (907) 364-2154

RESPONSES TO COMMENTS
Commentor No. 57: Rosemary Hagevig

Response to Comment 57.1

Thank you for your comment.

Response to Comment 57.2

Please see response to Comment 14.2

Response to Comment 57.3

Please see response to Comment 14.4

Response to Comment 57.4

Please see response to Comment 22.5

Response to Comment 57.5

Please see response to Comment 14.3

Response to Comment 57.6

Please see response to Comment 14.1

Response to Comment 57.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1988

Juneau Ranger
District

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- 0 The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- 0 The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- 0 The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- 0 Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- 0 The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- 0 The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.
- 0 The project impacts have been identified and thoroughly addressed.

- 0 The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Dawley S. Wilson
ADDRESS 23557 Ka-Seo-Aw Dr
CITY Juneau STATE AK ZIP 99801 TELEPHONE 789-0492

RESPONSES TO COMMENTS
Commentor No. 58: Dorothy Wilson

Response to Comment 58.1

Thank you for your comment.

Response to Comment 58.2

Please see response to Comment 14.2

Response to Comment 58.3

Please see response to Comment 14.4

Response to Comment 58.4

Please see response to Comment 22.5

Response to Comment 58.5

Please see response to Comment 14.3

Response to Comment 58.6

Please see response to Comment 14.1

Response to Comment 58.7

Thank you for your comment.

Jeanette de Lecuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RECEIVED

FEB 09 1980

Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 59; Robert B. Tonkin

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- o The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- o The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- o The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- o Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- o The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- o The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

o The project impacts have been identified and thoroughly addressed.

o The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Robert B. Tonkin
ADDRESS 3155 Pioneer Ave.
CITY Juneau STATE AK ZIP 99801 TELEPHONE 907-586-4105

- Response to Comment 59.1
Thank you for your comment.
- Response to Comment 59.2
Please see response to Comment 14.2
- Response to Comment 59.3
Please see response to Comment 14.4
- Response to Comment 59.4
Please see response to Comment 22.5
- Response to Comment 59.5
Please see response to Comment 14.3
- Response to Comment 59.6
Please see response to Comment 14.1
- Response to Comment 59.7
Thank you for your comment.

RECEIVED

Jennette de Leon
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1993

Juneau Range,
District

RESPONSES TO COMMENTS
Commentor No. 60: Leon Vance

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

60.1

o The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

60.2

o The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

60.3

o The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

60.4

o Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

60.5

o The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

60.6

o The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

60.7

o The project impacts have been identified and thoroughly addressed.

o The mitigation proposed for the identified impacts is appropriate and responsible.

NAME LEON VANCE
ADDRESS 10636 STARLITE COURT
CITY JUNEAU STATE AK ZIP 99801 TELEPHONE 586-2724

Response to Comment 60.1

Thank you for your comment.

Response to Comment 60.2

Please see response to Comment 14.2

Response to Comment 60.3

Please see response to Comment 14.4

Response to Comment 60.4

Please see response to Comment 22.5

Response to Comment 60.5

Please see response to Comment 14.3

Response to Comment 60.6

Please see response to Comment 14.1

Response to Comment 60.7

Thank you for your comment.

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RECEIVED
FEB 09 1983
Juneau Ranger District

RESPONSES TO COMMENTS
Commentor No. 61: McKie Campbell

61.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

0 The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

61.2 0 The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJF policy to encourage development in this area for at least 14 years.

61.3 0 The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development

61.4 0 Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

61.5 0 The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

61.6 0 The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

0 The project impacts have been identified and thoroughly addressed.

61.7 0 The mitigation proposed for the identified impacts is appropriate and responsible.

NAME McKie Campbell
ADDRESS 10608 HORIZON DR
CITY Juneau, AK STATE AK ZIP 99801 TELEPHONE 586-5852

Response to Comment 61.1

Thank you for your comment.

Response to Comment 61.2

Please see response to Comment 14.2

Response to Comment 61.3

Please see response to Comment 14.4

Response to Comment 61.4

Please see response to Comment 22.5

Response to Comment 61.5

Please see response to Comment 14.3

Response to Comment 61.6

Please see response to Comment 14.1

Response to Comment 61.7

Thank you for your comment.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801
FEB 09 1988
Juneau Ranger District

62.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- 62.2
- ◊ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
 - ◊ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

62.3

- ◊ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

62.4

- ◊ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

62.5

- ◊ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

62.6

- ◊ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

◊ The project impacts have been identified and thoroughly addressed.

62.7

- ◊ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Linda Hay - Linda Hay

ADDRESS P.O. Box 20966

CITY Juneau STATE AK ZIP 99802 TELEPHONE 789 1523 H

582 3134 W

RESPONSES TO COMMENTS
Commentor No. 62: Linda Hay

Response to Comment 62.1

Thank you for your comment.

Response to Comment 62.2

Please see response to Comment 14.2

Response to Comment 62.3

Please see response to Comment 14.4

Response to Comment 62.4

Please see response to Comment 22.5

Response to Comment 62.5

Please see response to Comment 14.3

Response to Comment 62.6

Please see response to Comment 14.1

Response to Comment 62.7

Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 63: Donald B. Burford

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1989
Juneau Ranger District

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- 63.1 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
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- ☐ The mitigation proposed for the identified impacts is appropriate and responsible.

Response to Comment 63.1

Thank you for your comment.

Response to Comment 63.2

Please see response to Comment 14.2

Response to Comment 63.3

Please see response to Comment 14.4

Response to Comment 63.4

Please see response to Comment 22.5

Response to Comment 63.5

Please see response to Comment 14.3

Response to Comment 63.6

Please see response to Comment 14.1

Response to Comment 63.7

Thank you for your comment.

NAME Donald B. Burford
ADDRESS P.O. Box 210189
CITY Juneau STATE AK ZIP 99801 TELEPHONE 907-780-4636

RECEIVED

FEB 09 1963

Juneau Ranger District

Dear Jenette

SEACC is a coalition of fifteen volunteer conservation groups in twelve communities across Southeast Alaska, from Yakutat to Ketchikan. SEACC's individual members include commercial and sport fishermen, Alaska Natives, subsistence users, hunters and guides, tourism and recreation business owners, small timber operators and high value-added wood product manufacturers, as well as concerned citizens from all walks of life. SEACC is dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while providing for balanced, sustainable use of our region's resources.

When it passed the Tongass Reform Law in 1990, Congress identified 46,000 acres of the Berners Bay watershed as one of 12 areas on the Tongass "to be managed in perpetuity in accordance with Land Use Designation II (LUD II)". This area was chosen for special management because of its high value fisheries habitat and the fact it is a very popular recreational destination for local residents. Recreational activities include kayaking, fishing, camping and hunting. Protection for these special values has been recommended and supported by the Alaska Department of Fish and Game (ADF&G), Alaska communities, and commercial fishermen'. By designating Berners Bay as a Legislated LUD II, Congress directed the Forest Service to manage this area primarily "in a roadless state to retain [its] wildland character."

Response to Comment 64.1

Thank you for your comment. Please see response to comment 4.1

LYNN CANAL CONSERVATION. **Haines** • FRIENDS OF GLACIER BAY. **Gaines** • FRIENDS OF BERNERS BAY. **Janeau**
WINDY RIDGE RESERVE. **Juneau** • FRIENDS OF ALASKA SOCIETY OF AMERICAN FOREST DWELLERS. **Poulin** **Palmer** • PELICAN FORESTRY COUNCIL
ATLANA FOR THE PEOPLE. **Warrens** CONSERVATION COALITION. **Premberg** • TONGASS CONSERVATION SOCIETY. **Ketchikan**
(a **WACADU** SOCIETY. **Juneau** **Chetani** **Teater** • JUNEAU GROUP SIERRA CLUB • YITKA CONSERVATION SOCIETY
TAKU CONSERVATION SOCIETY. **Juneau** • PRINCE OF WALES CONSERVATION LEAGUE. **Crug** • YITKAUT RESOURCE CONSERVATION COUNCIL

As noted by the House Floor Manager, Congressman George Miller, in comments explaining what kind of management was required for Berners Bay and the other eleven (11) areas designated LUD II's in the Tongass Timber Reform Act

"The specially designated LUD II areas will require careful and prudent management by the Forest Service. As adopted by the Conference Committee, the primary management directive is that LUD II areas 'are to be managed in a roadless state to retain their wildland character'. While LUD II designation permits certain specified activities not allowed in Wilderness, it is clear that the overriding priority is to protect these areas of critical fish and wildlife habitat by discouraging unnecessary development (such as road corridors) and requiring that permitted development (such as mining on patented claims) be limited in scope to be compatible with the area's wildland character...."

136 CONG REC H12814 (Oct 26, 1990 daily ed)

1 THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) AND OTHER LAWS REQUIRE THE FOREST SERVICE TO PLAN AHEAD IN A COMPREHENSIVE WAY FOR DEVELOPMENT WITHIN AND ADJACENT TO THE BERNERS BAY LEGISLATED LUD II AREA.

The Forest Service has a broad statutory obligation under the Multiple-Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976 (NFMA) to plan resource development on national forest lands in an integrated and comprehensive manner. The Tongass timber reform Act of 1990 requires "careful and prudent management" of the specially legislated LUD II areas like Berners Bay

Under NEPA's "action-forcing" procedures, the Forest Service is further required to have available and carefully consider detailed information concerning a proposed action's significant environmental impacts. This not only assures that important effects of a proposed action will not be overlooked or underestimated by the decision-maker but guarantees that the relevant information will be made available to the public, state and local decision-makers. Under NEPA's broad mandate, the Forest Service is required to understand the full implications of its decisions before they act. To comply with both the spirit and letter of NEPA, the Forest Service is required to fully comply with the Council of Environmental Quality (CEQ) regulations that govern how federal agencies, including the Forest Service, implement the procedural, "action-forcing" provisions of NEPA. See 40 C.F.R. § 1500.3

A The Forest Service Improperly Defined Its Proposal To Exclude Consideration of Other Actual Pending Proposals Which May Have Significant Cumulative Impacts on the Berners Bay Area

Before preparing an EIS, the Forest Service is required to undertake a "scoping process" to identify what "issues" and "actions" will be analyzed and subject to a particular EIS. See 40 C.F.R. § 1507(a)(2) 1502.4(a). The CEQ regulations further require that "[c]umulative actions, which when viewed with other proposed actions have cumulatively significant impacts" must be

NEAC's comments on Cascade Point Access Road DEIS

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Response to Comment 64.2

Thank you for your comment. LUD II management is discussed in TLRMP (1997).

Response to Comment 64.3

We agree, thank you for your comment.

Response to Comment 64.4

The Final EIS, Chapter 1, Scoping includes a review of the public involvement process for this project. All public comments on the Draft EIS have been considered by the deciding official for the Record of Decision. Please see response to comment 11.2.

considered together in a single EIS. Id. § 1508.25(a)(2). The CEQ regulations further caution that "[a] proposal may exist in fact as well as by agency declaration that one exists." Id. § 1508.23.

Although the Cascade Point project area is located outside the Berners Bay Legislated LUD II area, it is one of several actual proposed actions that could impact this special area's fish wildlife and recreational values. In oral and written scoping comments, as well as comments on the draft supplemental EIS for the Kensington Gold Project, SEACC has asked the Forest Service to consider "the individual and cumulative impacts of these projects in one comprehensive EIS." See e.g., Letter from SEACC to Birk (April 7, 1997). These actions include the Kensington mine, the Jualin mine, the Juneau Access Road, Goldbelt's village at Cascade Point, and proposed recreational development in Berners Bay.

Each of these "cumulative actions" have been actually proposed and could have cumulatively significant impacts on the fish, wildlife, and the wilderness recreation resources and uses in the Berners Bay Legislated LUD II area and Lynn Canal. Therefore, the CEQ regulations require the Forest Service to evaluate the direct, indirect, and cumulative impacts from all these proposed projects in one comprehensive EIS. 40 C.F.R. § 1508.25(a)(2).

The Forest Service's decision to restrict the scope of the DEIS to the Cascade Point Access Road prevents it from educating itself and others about the larger context in which decisions affecting the spectacular environment of the Berners Bay watershed are being made, thereby reducing the quality of the decisions made and rendering the EIS inadequate. Limiting the scope of this EIS is inconsistent with the purpose, goals, and procedures of NEPA or the "careful and prudent" management called for by Congress when it designated this area for special management. The failure to take a look at the cumulative impacts the actual proposed projects in the Berners Bay area might have on the resources and uses of the specially designated Berners Bay LUD II area at the earliest stage -- this NEPA process -- prevents this DEIS from contributing to the quality of the agency's decision, in violation of the goals and "action-forcing" purpose of NEPA. See id. §§ 1500.2(c), 1501.2, 1502.2, and 1502.5.

B. The DEIS Demonstrates the Problem with the New Two-Step Planning Process Adopted in the Revised Tongass Plan for Making Management Decisions

The Revised Tongass Plan substantially hampers the public's right to know, understand and participate in decisions affecting their public lands by dropping the requirement for a mid-level planning stage. The "two-step" planning process adopted for the Tongass is unworkable. It moves from the macro level (a 17 million acre forest) to the micro level (individual mining plans, roads, timber sales, and commercial recreation permits) without an intermediate step. This practice will cripple the Forest Service's ability to conduct a credible cumulative impact analysis. Without conducting public planning at some intermediate geographic scale, such as the greater Berners Bay watershed, the public's ability to understand and meaningfully participate in planning for the sustainable use of lands and resources important to the long-term stability of their community is impaired.

SEACC's comments on
Cascade Point Access Road DEIS

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Response to Comment 64.5

The range of alternatives considered in the document was developed based on the Purpose and Need and issues identified during the scoping process. The Final EIS, Chapter 4 discusses the cumulative effects of all alternatives in conjunction with other past, present, and future reasonably foreseeable actions in the area.

Response to Comment 64.6

Management for the Tongass National Forest has been analyzed in TLRMP (1997) including Berners Bay and the surrounding ecosystem. Please see the Forest Plan for the Tongass National Forest, Chapter 1.

64.6 The NEPA process conducted for the Cascade Point demonstrates the principal reason why the two-step process won't work on the Tongass -- the Forest Service does not comply with the letter and spirit of NEPA. Instead of fully integrating the NEPA process in the early stages of development in this special area, the Forest Service's approach to encouraging and facilitating public participation in the NEPA process is to issue project-level decisions in a piecemeal fashion, one project at a time.

Rather than using the NEPA process for the Cascade Point Access Road to collect and analyze important resource inventories for the entire Berners Bay and upper Lynn Canal Area, the Forest Service stayed focused on just a single piece of this ecological puzzle. The Forest Service thereby violated NEPA by failing to "initiate and utilize ecological information in the planning and development of resource-oriented projects." See 42 U.S.C. § 4332(2)(H). In order to fulfill its responsibility as "trustee of the environment for succeeding generations," 42 U.S.C. § 4331(b)(1), the Forest Service was obliged to collect and analyze comprehensive and accurate resource inventories for the entire Berners Bay area, which is almost entirely under Forest Service jurisdiction. This was not done. Such leadership would have fulfilled the Forest Service's responsibility under NEPA to encourage and facilitate informed agency and public review of the Cascade Point Access Road and other actual proposed projects that will have cumulatively significant impacts on the quality of the Berners Bay environment.

II THE CASCADE POINT DEIS FAILS TO ADEQUATELY ADDRESS CONNECTED ACTIONS, IN VIOLATION OF NEPA

CEQ regulations require the Forest Service to consider "connected actions" together in a single EIS. See 40 C.F.R. § 1508.25(a)(1). "Connected actions" are defined as actions that

- "(i) Automatically trigger other actions which may require environmental impact statements
(ii) Cannot or will not proceed unless other actions are taken previously or simultaneously
(iii) Are interdependent parts of a larger action and depend on the larger action for their justification." Id

In Goldbelt's March 1996 document, Echo Cove Master Plan, Goldbelt explains in detail the development they are planning for their Cascade Point property. Goldbelt proposes to construct a village with a lodge, a ferry dock, housing for residents and dormitories to serve miners working across the bay at the Kensington and Jualin mines, after the access road is in place. Goldbelt's decision on whether or not to proceed with these developments rests to some extent on whether or not the Forest Service grants them a right of way across USFS property. The development of Cascade Point is therefore a "connected action" and must be considered in the same EIS.

Current gold prices have affected the economic viability of developing both the Kensington and Jualin gold mines. How will the development of housing and transportation facilities on Goldbelt's property affect the economic viability of these projects? If the construction of this road and the pursuant development of Goldbelt's property at Cascade Point make these two

SE-ACC's comments on
Cascade Point Access Road DEIS

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Response to Comment 64.7

Please see response to comment 28.3.

Response to Comment 64.8

As approved, the Kensington Gold Project and the Cascade Point Access Road are not connected actions. The environmental analysis for the Kensington Gold Project has been completed, a Record of Decision has been signed, and a review and approval of an operating plan is underway.

64.8 projects economically viable, then they are "connected actions" and must be considered in the same EIS. See 40 C.F.R. §1508.25(a)(1)(ii)

64.9 In addition, "the Juneau Access Road would follow the same alignment as the proposed Goldbelt easement." DEIS at 4-11. Thus the development of the Cascade Point Access road will incrementally assist the construction of a road between Juneau and Skagway (identified as Alternative 2 by the Juneau Access DEIS). Allowing road construction to Goldbelt's property will also further enhance the feasibility of shuttle ferry service from Berners Bay (identified and Alternative 4D by the Juneau Access DEIS). Therefore, the Cascade Point Access Road and the Juneau Access project are "connected actions" and must be considered together in the same EIS.

64.10 The CEQ regulations require that in cases where one or more federal agencies are involved in actions "directly related to one another because of their functional interdependence or geographical proximity." "a lead agency shall supervise the preparation of an environmental impact statement." See 40 C.F.R. §1501.5(a)(1)&(2). The shared road alignment clearly shows both interdependence & geographical proximity between the two projects. As the major landowner affected by both projects, the Forest Service should serve as the lead agency to evaluate the direct, indirect, and cumulative effects of these "connected actions."

III THE CUMULATIVE EFFECTS ANALYSIS IN THE DEIS IS FAULTY AND INCOMPLETE.

While the DEIS discusses the cumulative effects of the various proposed cumulative actions planned for the Berners Bay area, it fails to completely disclose and analyze these potential impacts. The analysis is particularly incomplete in three main areas: recreation, wetlands, and impacts on cultural resources.

64.11 The DEIS admits that the cumulative effects on recreation would be several "[t]he cumulative effects of all these proposed activities would increase boat and air traffic and recreational use which would increase noise, visual and recreation use impacts." DEIS at 4-19. The DEIS fails to disclose, however, the full extent of recreational use of the area. Citing a study performed in 1990 and 1991, the DEIS reveals that popular activities in Berners Bay include fishing, wildlife viewing, camping, sightseeing, beachcombing, kayaking, canoeing, skiing, and motorboating. Citing a seven-year old study is inadequate in portraying current levels of recreational use of the Berners Bay area. How many recreational user days occur in the Berners Bay area? How many of these recreational activities depend on the wildland nature of Berners Bay? Will recreational use patterns shift from those dependent on solitude and a wilderness setting be replaced by more industrial forms of recreation? Will the company who currently markets recreational kayak trips in Berners Bay be able to operate successfully if all of the proposed projects are developed in Berners Bay? Without this important information on the likely cumulative effects on recreation, the public and decision makers are unable to make an informed decision on the proposed project.

64.12 The DEIS also reveals that "if all proposals for activities in Berners Bay be approved, the cumulative wetland fill would be approximately 299 acres." DEIS at 4-25. Clearly, there will be

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Response to Comment 64.9

The Juneau Access Improvements, Alternatives 2 and 4 and the Cascade Point Access road are not connected actions since either could occur without the other. Please refer to the Final EIS, Chapter 4 for a discussion on cumulative effects from the Juneau Access Improvements road.

Response to Comment 64.10 The Forest Service is a cooperating agency with Alaska Department of Transportation in the preparation of the Juneau Access EIS. In the Cascade Point Access Road EIS, the Forest Service is the lead agency and has disclosed in the Final EIS the direct, indirect and cumulative effects of the Proposed Action and Alternatives.

Response to Comment 64.11 The Final EIS, Chapter 4, Cumulative Effects, Recreational Activities discusses possible effects from projects proposed in the area.

Response to Comment 64.12 U.S. Army Corps of Engineers (COE) will consider direct impacts to aquatic resources as a result of the road and marine facility, and the cumulative impacts of the reasonably foreseeable development. Goldbelt, Inc.'s proposed development is described in the additional information section of the COE public notice for their Section 404 permit. Please see Final EIS, Chapter 1, Existing Management Direction, U.S. Army Corps of Engineers.

extensive cumulative impacts on wetlands due to these proposed projects. But it is unclear what effects this will have on the fish, wildlife, and human users who depend on these wetland resources. Federal regulations clearly state that

64.12

"dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that such a discharge will not have unacceptable adverse impact either individual or in combination with known and/or probable impacts of other activities affecting ecosystems of concern."

See 40 C.F.R. § 230.1(c). The DEIS, however, fails to disclose the real consequences of the cumulative effects on wetland resources. The public and decisionmakers, therefore, are unable to make an informed decision on whether or not these adverse impacts are acceptable.

In addition, the DEIS fails to disclose and analyze the potential cumulative effects on cultural resources in the Berners Bay. Clearly, if all of the proposed projects are approved, access to the Berners Bay area will greatly increase. With increased access, will damage to cultural resources increase due to theft and vandalism? How many cultural sites will be placed within easy public access if all of these projects proceed?

64.13

IV. THE DEIS FAILS TO CONSIDER A REASONABLE RANGE OF ALTERNATIVES IN VIOLATION OF NEPA.

CEQ regulations require the Forest Service to "[r]igorously explore and objectively evaluate all reasonable alternatives." See 40 C.F.R. § 1502.14(a). By artificially restricting the range of alternatives to include only this road, no road, or this road with a gate on it, the DEIS fails to consider a reasonable range of alternatives. Alternatives which the Forest Service should have considered include access to Goldbelt's property via marine transportation, construction of a road along the beach, and a different road alignment on National Forest Service land. Simply including the first two of these alternatives in the "No Action" alternative is inadequate. Without an examination of the site specific impacts and cost/benefits of these reasonable alternatives compared to the proposed road easement, the public lacks sufficient information to compare and evaluate the environmental, social, and economic merits of these alternatives in comparison to the preferred alternative.

64.14

Access via marine transportation or a beachfront road would meet the requirements of ANILCA, as well. Section 1323 of ANILCA requires the Forest Service to "provide access to nonfederally owned land within the boundaries of the National Forest System to secure to the owner the reasonable use and enjoyment thereof." See 16 U.S.C. 3210. According to the DEIS, "[d]evelopment at Cascade Point may still occur with the selection of the No Action Alternative." DEIS at 4-5. Thus, Goldbelt will still have "reasonable use and enjoyment" of its land even if the proposed road is not built. The Forest Service Manual 2700 further states that the objectives of granting rights-of-way for roads is to "provide access across National Forest System land to private land that is adequate to secure the owners thereof of reasonable use and enjoyment of their land without unnecessarily reducing the management options of the Forest Service or damaging National Forest System lands or resources." DEIS at 1-9. Therefore, to comply with

64.15

SEACC's comments on
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Response to Comment 64.13 The Final EIS had been expanded to consider the effect the project may have on any archeological sites in the Sawmill Creek area. It is not known how extensive the Goldbelt development will ultimately be. The immediate area near the terminus of the access road has been considered in the Final EIS. Clearly it is not possible to predict or measure the degree of vandalism or theft which may be a result of this development. Please refer to the Final EIS, Chapter 4, Cumulative Effects, Cultural Resources for a discussion of possible effects from projects proposed in the area.

Response to Comment 64.14

The Forest Service has no jurisdiction over actions on private land. Please see the Final EIS, Chapter 2, Alternatives Eliminated from Detailed Study and response to Comment 64.5. No significant issues would have been addressed by an alternate road alignment.

Response to Comment 64.15

Section 1323 (a) of ANILCA states "... the Secretary shall provide such access to nonfederally owned land within the boundaries of the National Forest System as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof..." Adequate access is defined in 36 CFR 251.111 as: "a route and method of access to non-Federal land that provides for reasonable use and enjoyment of the non-Federal land consistent with similarly situated non-Federal land and that minimizes damage or disturbance to National Forest System lands and resources." 36 CFR 251.114 states that "The authorizing officer shall determine what constitutes reasonable use and enjoyment of the lands..." The Forest Service Record of Decision provides the rationale for the selected alternative. Mitigation measures, listed in the Final EIS, Chapter 2 would be implemented to "minimize damage or disturbance to National Forest System land and resources".

↑ this management directive, the Forest Service must demonstrate that this road will not unnecessarily reduce management options or damage National Forest lands or resources. To do this, the Forest Service must consider a reasonable range of alternatives to the proposed road alignment

64.15

The Forest Service must consider all reasonable alternatives, even if they are not within the agency's jurisdiction. A potential conflict with a state or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. See 40 C.F.R. § 1506.2 (d). Therefore, the fact that a road route on Goldbelt, Inc. land near the shoreline of Echo Cove may be inconsistent with the Alaska Coastal Zone Management Program (ACMP) does not make the road route unreasonable. In evaluating this alternative, the Forest Service would, however, have to consider these conflicts and disclose these conflicts with the ACMP. As noted in the DEIS, the ACMP requires roads to be located "inland unless no prudent and feasible alternatives exist." DEIS at 4-7. Moreover, if current legislation introduced in the Alaska State Legislature becomes law, the ACMP might not even exist when this project is to be implemented.

64.16

V THE PRE-SELECTION OF THE ROAD ROUTE VIOLATES NEPA

In a letter dated December 11, 1995, a full two years before the release of the Cascade Point Access Road DEIS, Goldbelt proposed an agreement on the Cascade Point Access Road alignment to the Forest Service and the State of Alaska Department of Transportation. These two agencies agreed to this proposal. By signing this agreement, the Forest Service District Ranger made a decision about the road alignment outside of the public process. Such decisionmaking outside of the public process violates the fundamental basis of NEPA. "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made." See 40 C.F.R. § 1500.1(b). Considering the pre-selection of this road route, the Forest Service seems to be using this EIS to justify a decision already made, in violation of NEPA. "[e]nvironmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." See 40 C.F.R. § 1502.2.

64.17

VI THE DEIS VIOLATES THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

This area, governed under the Covee-Davies Management Area plan was the traditional home of various tribes and clans of Tlingit, including the Shark Clan of the Woosh-key-ton Tribe. Evidence of historic mining activities can also be found in the area.

The DEIS notes that "a cultural resources survey was completed along the proposed access road alignment and the proposed Cascade Point development area in the summer of 1996." DEIS at 3-12. This survey discovered two sites which were "determined eligible for the National Register of Historic Places." *Id.* The DEIS does not, however, disclose whether additional sites were identified, but determined ineligible. Although the survey identified a number of culturally modified trees (CMTs) the DEIS does not analyze the traditional cultural significance of these trees.

64.18

NEAACC's comments on
Cascade Point Access Road DEIS

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Response to Comment 64.16

The Final EIS, Chapter 2, Alternatives Eliminated from Detailed Study has been revised to explain that the road route near the shoreline does not address any significant issues. Therefore, it was carried forward as part of the No Action Alternative.

Response to Comment 64.17

Please see response to Comment 11.3.

Response to Comment 64.18

The Draft EIS does not indicate that two sites were determined eligible. Instead, the site on Goldbelt, Inc. private land which includes 159 culturally modified trees (CMTs) and the small midden has been determined as an eligible property to the National Register. Data has been collected for the 86 CMTs which were identified along the proposed road corridor. The Draft EIS does consider the traditional use of hemlock bark as *sux'*, a culturally traditional use of hemlock bark.

Section 106 of the NHPA requires the Forest Service to perform an effects analysis on all historic resources which meet informal criteria, not just those sites formally found to be eligible for listing in the National Register of Historic Places. Even an informal finding of eligibility triggers the necessity to perform an effects analysis. See 36 C.F.R. § 800.4(c). Therefore, the Forest Service must disclose and evaluate all potential impacts on all sites which were found at some point to be potentially eligible for inclusion in the National Register.

64.19

The DEIS concludes that "[n]o impacts to cultural resources are expected from the Proposed Action." Not only is this analysis totally inadequate since it fails to consider impacts due to theft and vandalism, it also contradicts other information provided by the DEIS. While the DEIS claims that there will be no impacts to cultural resources, it also lists various measures for "[p]roposed mitigation for impacts on cultural resources," including "carrying out chronological research" and "putting 'In-Place' interpretive display in the proposed lodge." DEIS at 4-9.10. Why would mitigation be necessary if there are to be no impacts on cultural resources? Furthermore, how do either of these actions mitigate impacts to cultural resources in the area? Also listed as a mitigating action are mapping and documenting the culturally modified trees before clearing activities. Do clearing activities mean the CMTs will be cut down? If such clearing is actually planned, then the associated destruction of these CMTs must be considered to be an impact on cultural resources.

64.20

VII THE DEIS FAILS TO CONSIDER A COST/BENEFIT COMPARISON OF THE ALTERNATIVES, IN VIOLATION OF NEPA

Section 102(2)(C)(iv) of NEPA requires an analysis of "the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity." The analysis present in the DEIS is cursory and incomplete. The Forest Service fails to consider the irretrievable loss of wildland values resulting from the road discussed in this DEIS and Goldbelt's developments at Cascade Point.

64.21

As discussed on p. 3-10, Berners Bay is an extremely popular public recreation area. The 1990 and 1991 surveys for the Kensington Gold Project DEIS showed that 100% of respondents use the Berners Bay area for recreation. All identified public uses of Berners Bay depend on the area's wildland values. These uses are listed in the DEIS (in order of popularity) as fishing, wildlife viewing, camping, sightseeing, beach-combing, kayaking, canoeing, skiing, and motor-boating. DEIS at 3-10. In addition, one commercial outfitter--Alaska Discovery--uses the area for wilderness kayak trips. DEIS at 3-11. Considering the growing interest in adventure-based tourism, this is a commercial activity with a good potential for growth in the foreseeable future. Currently Alaska Discovery charges approximately \$200 per user day for their guiding services in Berners Bay. As with recreation uses of Berners Bay, this commercial activity relies on the wildland values of the area.

64.22

The Cascade Point access road and associated connected actions will significantly impact the wildland values of the Berners Bay area. The DEIS fails to fully discuss this loss of wildland values and its effect on recreation and tourism users. The relative merits of the different

SFAC's comments on
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Response to Comment 64.19

The Final EIS in Chapter 4, Cultural Resources clearly displays the sites identified, the Determination of Eligibility found for those sites and the Determination of Effects on those sites which have been determined eligible.

Response to Comment 64.20

The Final EIS considers the Determination of Effect for all Alternatives on all sites. The Draft EIS points out that there is a site on Goldbelt, Inc.'s private land and mitigation is proposed for the impact of this site. The proposed mitigation would provide new information on the archeological site. Goldbelt, Inc. would avoid the campsite/midden area during construction, and would construct an interpretive display that would be placed at their lodge. The data collection would enhance the existing knowledge of the midden/campsite areas. The regulations in 36 CFR 800 require that the effects an activity will have on a site must be determined. Data collection is considered a sufficient method for the preservation of such information. Clearing (cutting) of culturally modified trees (CMTs) would only be done after data have been collected on the trees. The State of Alaska does not consider CMT's to be an archeological site unless they are identified in unusually large numbers. It has been determined that the CMT's along the road corridor are not an archeological site. Data have been collected for these trees.

Response to Comment 64.21

Please see the Final EIS, Chapter 4 for an added section called Effects of Short-term Uses on Long-Term Productivity. A discussion of the effects on LUD II lands has been added to the Final EIS, Chapter 4, Recreation.

Response to Comment 64.22

Please see the updated discussion in the Final EIS, Chapter 4, Cumulative Effects and Recreational Activities. The indirect effects to the LUD II area in Berners Bay would be within the Standards and Guidelines prescribed by the Tongass Land and Resource Management Plan.

↑ alternatives--with respect to loss of wildland values and effects on recreation and tourism--are also not adequately considered. This omission makes it impossible for the public and decision makers to evaluate the alternatives. Without a formal cost/benefit comparison of the alternatives, the DEIS does not provide a "full and fair discussion of significant environmental impacts" associated with any of the possible alternatives. See 40 C.F.R. § 1502.1.

Thank you for this opportunity to comment

Best Regards



Peggy Wilcox
Grassroots Organizer

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FEB 09 1990

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Juneau Ranger
District

65.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

65.2 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.

65.3 ☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.

65.4 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.

65.5 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.

65.6 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.

65.7 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

☐ The project impacts have been identified and thoroughly addressed.

☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Patrick Wonser
ADDRESS P.O. Box 20803 (3251 Douglas Hwy.)
CITY JUNEAU STATE AK ZIP 99802 TELEPHONE (907) 461-4849

RESPONSES TO COMMENTS
Commentor No. 65; Patrick Wonser

Response to Comment 65.1

Thank you for your Comment

Response to Comment 65.2

Please see response to Comment 14.2

Response to Comment 65.3

Please see response to Comment 14.4

Response to Comment 65.4

Please see response to Comment 22.5

Response to Comment 65.5

Please see response to Comment 14.3

Response to Comment 65.6

Please see response to Comment 14.1

Response to Comment 65.7

Thank you for your comment.



8800 Glacier Highway, Suite 112 1/2 ♦ Juneau AK 99801

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2/5/98

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Miss de Leeuw,


I would like to express my support for the proposed road extension to Cascade Point. Proposed action "B" would provide Goldbelt, a good corporate citizen, easy access to their lands and allow them to develop the area consistent with the CBJ comprehensive plan.

Since their desire is to access private lands, the impact on Forest Service property is minimal. The opening of the property could go a long way toward making East Lynn Canal transportation more efficient. Ferry travel time could be reduced substantially resulting in a far more efficient system.

The jobs and economic impact possible from this proposal will have long term positive benefits for our community. As President of the Chamber of Commerce, it is my desire to help facilitate any development that can provide a sound economic base for Juneau. This is a project that will open opportunities for years to come and is especially desirable since it has a negligible impact on the environment.

Again, I urge you to accept proposed action "B". Thank you for your consideration.

Sincerely,


Bruce N. Abel
President

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FEB 10 1998
JUNEAU CHAMBER OF COMMERCE

RESPONSES TO COMMENTS

Commentor No. 66: Bruce Abel, Juneau Chamber of Commerce

Response to Comment 66.1

Thank you for your comment.

Response to Comment 66.2

Please see response to Comment 14.1

Response to Comment 66.3

Thank you for your comment.

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Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 67: Kathy Molly

January 31, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. De Leeuw:

67.1 I am writing in support of Golbelt's proposed road to Cascade Point. This area is identified as a "new growth area" in CBJ's 1984 Comprehensive Plan. A road to Cascade point is consistent with the Comprehensive Plan because it will facilitate this "new growth." Because the development proposed focuses on providing lodging and services for tourists and recreationalists, it is a suitable design for what is already a remote recreational area.

67.2 It would also appear that the alignment chosen for the road is sensible. Placing the road in the alignment proposed will result in the minimum amount of additional environmental disturbance if a highway north is built since it will follow the same path.

67.3 Change is always difficult for some people to adjust to, and I am sure you have received letters from those who would stop change at any cost. However, I for one support this change because it is apparent from the Cascade development plan and Draft EIS that this development that was carefully planned with the community's needs in mind.

Very Truly Yours,

Kathy Molly
9764 Trinity Dr #3
Juneau AK 99801

Response to Comment 67.1

Thank you for your comment.

Response to Comment 67.2

Please see response to Comment 14.2.

Response to Comment 67.3

Please see response to Comment 14.3

Response to Comment 67.4

Please see the Forest Service Record of Decision for a description of the selected alternative and the rationale for the decision.

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1983
Juneau Ranger
District

RESPONSES TO COMMENTS
Commentor No. 68: Paul M. Richards

- 68.1 I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:
- 68.2
- ◊ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
 - ◊ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
 - ◊ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development
 - ◊ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
 - ◊ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
 - ◊ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.
 - ◊ The project impacts have been identified and thoroughly addressed.
 - ◊ The mitigation proposed for the identified impacts is appropriate and responsibility

NAME Paul M. Richards
ADDRESS 217-2nd St Suite 201
CITY Juneau STATE AK ZIP 99801 TELEPHONE 4634664

Response to Comment 68.1
Thank you for your comment.

Response to Comment 68.2
Please see response to Comment 14.2

Response to Comment 68.3
Please see response to Comment 14.4

Response to Comment 68.4
Please see response to Comment 22.5

Response to Comment 68.5
Please see response to Comment 14.3

Response to Comment 68.6
Please see response to Comment 14.1

Response to Comment 68.7
Thank you for your comment.

Gateway Technologies, Inc. 8800 Glacier Highway, Suite 224 1/2, Juneau, Alaska 99801
 907 789 6856 fax
 e-mail bettersci@alaska.net

February 7, 1998

RECEIVED

Jennette de Leeuw
 USDA Forest Service
 Juneau Ranger District
 8465 Old Dairy Road
 Juneau, Alaska 99801

FEB 09 1998

Juneau Ranger
 District

Dear Ms. de Leeuw:

Gateway Technologies, Inc. supports the proposal by Goldbelt, Incorporated for an access road to, and the potential development of, Cascade Point. The proposal is consistent with the Comprehensive Plan adopted by the City and Borough of Juneau in 1984. Goldbelt's Echo Cove lands have been designated as a "New Growth Area" in the Comprehensive Plan since its adoption.

We think all of the project impacts have been identified and addressed and we note that the overall growth envisioned by Goldbelt is only about 10% of their land. The Goldbelt plan minimizes direct impacts to Echo Cove and the mitigation measures are appropriate and responsible.

Goldbelt has already proven its ability to operate responsibly in sensitive areas by its 1997 helicopter logging projects at Echo Cove and West Douglas and their approach to eco-tourism in Glacier Bay.

The development proposed at Cascade Point will enable more efficient and improved marine transportation services to Skagway and Haines. In view of recent changes to the Alaska Marine Highway System, this project will certainly benefit all of the people in the communities of Northern Lynn Canal.

I am aware that national policy provides for access through federal lands to private lands in order to promote responsible economic development and to improve public transportation access. This project meets those criteria.

In view of the many favorable characteristics of this proposed project, I encourage the Forest Service to issue a favorable decision for the preferred alternative for Goldbelt to build and operate an access road to Cascade Point.

Thank you for this opportunity to comment.

Respectfully,

Randy Wanamaker

Randy Wanamaker
 Registered Environmental Assessor

Response to Comment 69.1

Thank you for your comment.

Response to Comment 69.2

Please see response to Comment 14.2.

Response to Comment 69.3

Please see response to Comment 14.4

Response to Comment 69.4

Please see response to Comment 14.1

Response to Comment 69.5

Please see the Final EIS, Chapter 1, Existing Management Direction for a description of Forest Service policy and the Forest Service Record of Decision for the selected alternative and the rationale for the decision.

Response to Comment 69.6

Please see the Forest Service Record of Decision for the selected alternative.



February 4, 1998

RECEIVED

FEB 09 1998

Jennette de Leeuw
USDA Forest Service
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Juneau Hanger
Forest

Dear Ms. de Leeuw:

Sealaska Corporation is the Regional Corporation organized pursuant to the terms of the Alaska Native Claims Settlement Act (ANCSA) for the benefit of the Native People of Southeast Alaska. Sealaska has over 16,000 shareholders, the majority of whom live and work throughout Southeast Alaska.

70.1 Sealaska has studied and supports the proposal by Goldbelt, Incorporated for an access road to and the potential development of Cascade Point. The access road and development is consistent with the Comprehensive Plan adopted by the City and Borough of Juneau and the Goldbelt lands are designated as a "New Growth Area" in the Comprehensive Plan.

70.2 All of the project impacts have been identified and addressed. The overall growth envisioned by Goldbelt not only minimizes direct impacts to Echo Cove but the mitigation measures they propose are appropriate and responsible.

70.3 Further, the private land proposed for eventual development is only about 10% of the area. Goldbelt has already demonstrated its commitment to operating responsibly in this sensitive area by its recent helicopter logging in 1997. The development of private land should not be unreasonably restricted.

70.4 The development proposed at Cascade Point will enable more efficient marine transportation in northern Lynn Canal, including improved access to Skagway and Haines. This project will benefit the people of the Community of Juneau as well as the communities of northern Lynn Canal.

70.5 If this project is allowed to proceed, the Forest Service will be helping Goldbelt to fulfill the intent of ANCSA to provide responsible economic and employment opportunity for its shareholders.

Response to Comment 70.1

Thank you for your comment.

Response to Comment 70.2

Please see the response to Comment 14.2.

Response to Comment 70.3

Thank you for your comment.

Response to Comment 70.4

Please see the response to Comment 14.4.

Response to Comment 70.5 Please see the response to Comment 14.1

Response to Comment 70.6

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

↑ Sealaska encourages the Forest Service to issue a favorable decision for the preferred alternative for Goldbelt to build and operate an access road to Cascade Point.

Thank you for this opportunity to comment on this important project.

Sincerely,

SEALASKA CORPORATION



Robert W. Loescher
President and Chief Executive Officer

cc: Mayor Dennis Egan
Senator Jim Duncan
Rep. Kim Elton
Rep. Bill Hudson
Richard P. Harris
Ernie Hillman
Joe Beedle
Phil Janik

RECEIVED

FEB 09 2000

Juneau Police
Djia

9029 Rosedale
Juneau, Alaska
February 8, 1998

Juneau Ranger
District

0551 6 0 B33

Jennete de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RECEIVED

Dear Ms. Leeuw:

I strongly support the Cascade Point Access Road project as proposed by Goldbelt and as presented in the DEIS prepared by the USFS. I have reviewed the DEIS and attended the USFS open house. My support is based in part on the following points.

1. One of the things that has made America great is the unrestricted development of private lands. This fundamental right has been severely restricted by the extreme environmental movement during the past 2 decades. Development of and access to private property should not be denied.
2. The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan developed by the CBJ. It is my understanding that it has been CBJ policy to encourage development in this area for the past 14 or 15 years.
3. It is my understanding that a strip of land was set aside for building a road in this area some years ago. It is very encouraging to see private industry building roads that government should have previously built.
4. The Goldbelt Corporation has gone out of its way to design a good project and to minimize any perceived negative impacts.
5. The proposed project will make it easier for less robust people to access additional public (USFS) lands. Some lands previously accessible only to the physically gifted may now become accessible to everyone.

I have discussed with some of the Goldbelt people if it would present a financial burden on them to extend the end of their proposed road to the USFS boundary and provide public access to the Forest Service lands beyond Goldbelt lands and was told that they could probably accommodate that kind of request. I would therefore request that this proposal become a part of the Final EIS and that an unrestricted parking area be built for the general public at the end of the road. It would be preferable that this parking area be built on Forest Service lands with public funds.

Thank you for the opportunity to comment on this proposal and I trust that the additional paperwork will move ahead quickly so that Goldbelt's project can move ahead.

Sincerely,

Anthony Williams
Anthony Williams

RESPONSES TO COMMENTS
Commentor No. 71: Anthony Williams

71.1

Response to Comment 71.1

Thank you for your comment.

71.2

Response to Comment 71.2

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority and policy regarding access to private land.

71.3

Response to Comment 71.3

Please see response to Comment 14.2.

71.4

Response to Comment 71.4

Please see response to Comment 14.3.

71.5

Response to Comment 71.5

Thank you for your comment.

71.6

Response to Comment 71.6

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

71.7

Response to Comment 71.7

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1990

RECEIVED

RESPONSES TO COMMENTS
Commentor No. 72: Kerri Tonkin

I support "Proposed Action B", the Forest Service Preferred Alternative for the 2.5 mile access road to Cascade Point for the following reasons:

- 72.1 ☐ The construction of the proposed access road and potential Cascade Point development is consistent with the Comprehensive Plan as envisioned and adopted by the City and Borough of Juneau in 1984.
- 72.2 ☐ The Goldbelt Echo Cove lands are designated "New Growth Area" is that same Comprehensive Plan, and have thus been designated since 1984. It has been CBJ policy to encourage development in this area for at least 14 years.
- 72.3 ☐ The overall development envisioned by Goldbelt minimizes direct development impacts to Echo Cove. Only about 10% of the private land is proposed for development.
- 72.4 ☐ Except for the road alignment that is owned by the U. S. Forest Service, the proposed development is planned for private land and the development of private property should not be unreasonably restricted.
- 72.5 ☐ The U.S. Forest Service road alignment clearly suggests an expectation of a road right-of-way for eventual access and land development in this area.
- 72.6 ☐ The development envisioned at Cascade Point would enable more efficient marine transportation services within the northern region of Lynn Canal including improved access to Haines and Skagway.

☐ The project impacts have been identified and thoroughly addressed.

☐ The mitigation proposed for the identified impacts is appropriate and responsible.

NAME Kerri Tonkin
ADDRESS 3155 Picnic Ave.
CITY Juneau STATE AK ZIP 99801 TELEPHONE 463-3155

Response to Comment 72.1

Thank you for your comment.

Response to Comment 72.2

Please see response to Comment 14.2

Response to Comment 72.3

Please see response to Comment 14.4

Response to Comment 72.4

Please see response to Comment 22.5

Response to Comment 72.5

Please see response to Comment 14.3

Response to Comment 72.6

Please see response to Comment 14.1

Response to Comment 72.7

Thank you for your comment.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Southeast Alaska Ecological Services
3000 Village Blvd., Suite 201
Juneau, Alaska 99801-7100

RECEIVED

FEB 10 1998

Juneau Ranger
District

February 5, 1998

Ms. Jennetta de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Re: Cascade Point Access Road, Draft Environmental Impact Statement (DEIS)

Dear Ms. de Leeuw:

The U.S. Fish and Wildlife Service has reviewed the subject document and offers the following comments for your consideration.

General Comments

The DEIS is confusing in that the No Action alternative includes consequences of proposed development at Cascade Point. A No Action alternative should relate to the project, in this case the construction of the road. If the consequences of the planned development at Cascade Point are important enough to be discussed in the DEIS, then all aspects of Goldbelt's development plan for the project area need to be discussed.

A good deal of effort went into outlining the expected environmental effects of some aspects of the development proposed for Cascade Point. Very little effort went into defining the effects of the proposed land exchange which has a direct bearing on the proposed development at Cascade Point. The Tongass National Forest lands requested for exchange are in land category "Legislated LUD II". Such lands are to be managed in perpetuity in accordance with LUD II, pursuant to the Tongass Timber Reform Act of 1990, and it would take an act of Congress to change the land classification before a trade could take place. The Service interprets this restrictive land classification to mean that Congress intended the land to remain in public ownership.

The proposed land exchange would have unaddressed effects on the Berners Bay area. Additional logging could occur, recreational activities would be greatly restricted in that there would be no public access to Berners Bay or to national forest land along the proposed road corridor as now exists. The land exchange issue is not adequately addressed in this document and it is of equal importance as the addressed development for Cascade Point. Addressing the land exchange independently in another NEPA document is piecemealing the project, as the land exchange is essential to Goldbelt's master plan for the Berners Bay area.

The DEIS only addressed the physical effects of fill placed in the near shore zone for a docking and barge facility. A log transfer\barge facility will have additional adverse effects than those discussed. These effects need to be addressed. Another issue not addressed in relation to the proposed development at Cascade Point is the effect the increase in boating activity will have on the marine resources in Berners Bay, particularly the endangered humpback whale and threatened Steller sea lion.

RESPONSES TO COMMENTS

Commentor No. 73: Nevin Holmberg, U.S. Fish and Wildlife Service

Response to Comment 73.1

Please see response to Comment 29.1. Goldbelt Inc.'s proposed development is included in the Final EIS, Chapter 4, Cumulative Effects.

Response to Comment 73.2

A land exchange is not part of this process. An Agreement to Initiate was signed by Goldbelt, Inc. and the Forest Service which listed federal land in Echo Cove and Hobart Bay that Goldbelt, Inc. is interested in acquiring. The Agreement to Initiate is not a binding document. No formal proposal has been made to trade any lands in Berners Bay. No LUD II lands are included in the Agreement to Initiate. Possible cumulative effects from a land exchange are discussed in the Final EIS, Chapter 4, Cumulative Effects.

Response to Comment 73.3

Please see expanded discussion of possible effects from a land exchange in the Final EIS, Chapter 4, Cumulative Effects.

Response to Comment 73.4

The U.S. Army Corps of Engineers (COE) evaluation, as part of their permitting process, will consider impacts of the proposed dock and barge facility to a number of public interest factors which include: 1) physical/chemical characteristics and anticipated changes, 2) biological characteristics and anticipated changes, 3) human use characteristics and impacts, 4) secondary and cumulative effects, 5) other authorizations required (CZM and ADEC 401), 6) comments received and 7) 404(b)(1) guidelincs analysis.

Response to Comment 73.5

The Final EIS, Chapter 3 has been modified to include additional discussion of marine resources in Berners Bay. U.S. Army Corps of Engineers evaluation will include potential impacts to endangered or threatened species, in consultation with USFWS and NMFS.

One important species, eulachon, is not addressed in the DEIS. Eulachon enter the rivers flowing into Berners Bay in the last part of April until early May. Juvenile eulachon are found leaving the rivers from June through July. Both adult and juvenile eulachon are an important spring food resource for many species of fish and wildlife. Many species of birds and mammals feed on eulachon or their eggs during the spawning period including bald eagles, seabirds, shorebirds, ducks, Steller sea lions, harbor seals, humpback whales, bear, mink, otter, and wolf. Because of the numbers of animals using the abundant fish resources found in Berners Bay, the area has considerable resource value. Ferry and/or additional boating activity from Cascade Point facilities would create a disturbance that could have a significant adverse affect on those fish and wildlife resources.

73.6

Response to Comment 73.6

Impacts to the Berners Bay eulachon stock could result from impacts to the habitat at the head of Berners Bay and the lower rivers that feed the bay. It is highly unlikely that boat use at the mouth of the bay would impact these resources. Please see response to Comment 64.12.

Response to Comment 73.7

Please see response to Comment 64.12.

Response to Comment 73.8

Please note correction in the Final EIS, Chapter 4, Cumulative Effects.

Response to Comment 73.9

Please note correction in the Final EIS, Chapter 1.

Response to Comment 73.10

Thank you. You are correct. Please note correction in the Final EIS, Chapter 2.

Response to Comment 73.11

Please see the Record of Decision, Environmentally Preferred Alternative, Response to Comment 73.12

Your recommendations will be followed on National Forest System land as per a Memorandum of Agreement between the Forest Service and the U.S. Fish and Wildlife Service. The Forest Service has no jurisdiction to require certain development practices on private land. Your recommendation has been forwarded to Goldbelt, Inc.

73.11

73.12

The stated affects to Pacific herring by development at Cascade Point are minimized. Herring spawn and rear in the Cascade Point area and development would degrade this important habitat. The commercial fishery for the Lynn Canal herring stock ended in 1982 due to low abundance. Further, that herring stock has continued to decline. Unaltered shoreline habitat from Auke Bay to Berners Bay used by spawning herring has decreased significantly from the 1960s. Spawning activity is now concentrated in the Berners Bay area. Previous areas used by spawning herring where development occurred (e.g., Long Island, near Hoonah), are not used any longer. Pacific herring do not simply move to another area to spawn. Elimination or degradation of spawning areas may destroy the future of that specific segment of a population.

The DEIS lists the Lacey River Hydro project as one that may be developed in the future. As of October 24, 1997, Lacey River Hydro relinquished its FERC permit for the Lacey River Hydro power project. There are no current permits to develop a hydropower facility in the Berners Bay area. All electrical power would have to be produced by fossil fuel driven generators.

Specific Comments

Page 1-12, first line. The correct title is Eagle Protection Act, not Bald Eagle Protection Act.

73.9

Page 2-1. The access road would not need authorization under Section 10 of the Rivers and Harbors Act, only authorization under Section 404 of the Clean Water Act.

73.10

The Service agrees with the statement that non-authorization for the access road would not prevent access to Goldbelt, Inc. property. Therefore, the environmentally preferred alternative is the No Action alternative. The need for a road is questionable. However, if the road is authorized, then the need for a log transfer/barge facility is questionable as all materials could then be transferred via the road to Cascade Point.

Page 3-6. Since 1970, the Service's surveys have recorded six bald eagle nests within the proposed project area. Two of the nests have apparently disappeared (as of 1997). One eagle nest has been observed by aerial survey only. In order to help protect bald eagle nest trees and provide future alternate nest sites, we recommend that a 330 foot undisturbed buffer zone be maintained around bald eagle nest trees. Further, blasting is one of the most disturbing activities that can take place near an active eagle nest. If blasting is anticipated, we recommend that no blasting take place within 1/4 mile of an eagle nest from March 1 through May 31 and this period should continue to August 31 for nests in active use by eagles. We also recommend there be no repeated helicopter flights within 1/4 mile of any bald eagle nest from March 1 through May 31, and this period should continue to August 31 for active nests.

73.12

Response to Comment 73.13

None of the existing eagles nest trees are within 330 feet of the proposed road clearing limits. The potential of losing trees to windthrow should not be increased by road clearing. One nest tree is located approximately 100 feet from the clearing of the proposed Cascade Point development. This tree has not been used for the last three seasons. The stand it is in was judged to be windfast and the clearing associated with the Cascade Point development would not likely increase its chances of blowing down.

Response to Comment 73.14

Please see Final EIS, Chapter 4, Environmental Consequences.

Response to Comment 73.15

Please see the Final EIS, Chapter 1, Other Permits Required.

Response to Comment 73.16

Please see correction in the Final EIS in Chapter 4.

Trees located inland from the waterfront are generally not windfirm and are vulnerable to windthrow. Opening the forest by clearing a road right-of-way will likely increase the vulnerability of some eagle nest to exposure from wind.

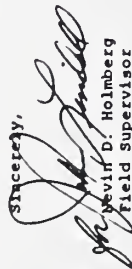
The project will significantly increase the use of Bernera Bay by humans. There will be increased noise, activity, pollution, and disturbance.

Page 4-7. The placement of fill material within the tidal zone will require authorization under Section 404 of the Clean Water Act along with authorization under Section 10 of the Rivers and Harbors Act.

Page 4-14, paragraph 5. We disagree. The land exchange would contribute to additional wildlife impacts in the Bernera Bay watershed. The land exchange would increase the likelihood of more logging and is necessary to fully implement Goldbelt's master development plan.

Thank you for the opportunity to comment.

Sincerely,


Devin D. Holmberg
Field Supervisor

cc: ADFG, Douglas
NMFS, Juneau
EPA, Anchorage
COE, Juneau
ADGC, Juneau

February 6, 1998

RECEIVED

FEB 10 1998

Ms. Jannette de Leeuw
Juneau Ranger District
U. S. Forest Service
Tongass National Forest, Alaska Region
8465 Old Dairy Road
Juneau, Alaska 99801

Juneau Ranger
District

Dear Ms. de Leeuw:

Re: Cascade Point Access Road Draft Environmental Impact Statement (DEIS)

Under the proposed action the Tongass National Forest would provide Goldbelt, Incorporated a road easement across National Forest land to Cascade Point in Berners Bay. The Alaska Department of Fish and Game (ADF&G) has reviewed the subject document and offers the following comments.

The DEIS includes "reasonably foreseeable actions" in the no-action alternative that include commercial development and access at Cascade Point. The DEIS states that the proposed road across the U. S. Forest Service (USFS) lands (Alternative B and C) would have less impact to wildlife and other resources than the no-action alternative. We do not believe it is reasonable to assume that the non-USFS road alignments and development at Cascade Point would be allowed to occur. The DEIS states that a beach road alignment that includes State tidelands would not be consistent with the Alaska Coastal Management Program (ACMP). Water access to Cascade Point has always been available, but development there has not yet occurred. Additionally, if wetland or intertidal fill is proposed at Cascade Point, development will depend on meeting the requirements of the Clean Water Act and the ACMP. Consequently, we recommend that this National Environmental Policy Act (NEPA) review be reorganized to only include an analysis of feasible access alternatives. The no-action alternative in this NEPA document should truly not include actions that affect the environment.

Response to Comment 74.1

Please see response to Comment 29.1.

The DEIS states that ADF&G provides comments and recommendations to federal agencies via the Fish and Wildlife Coordination Act. Actually, ADF&G will comment pursuant to the ACMP. Because resident fish occur in Cascade Creek a permit may also be needed from ADF&G for the proposed stream crossing, pursuant to AS 16.05.840 (Fishway Act). Under the Fishway Act, culvert installation; stream realignment or diversion; dams; low-water crossings; and construction, placement, deposition or removal of any material below ordinary high water in a fish stream requires approval from ADF&G. Goldbelt, Inc. will also need an AS 16.05.840 permit from ADF&G for a diversion to divert water from Cascade Creek because of this action's potential impact on fish passage.

74.2

Page 2-1, Alternative A - No Action

The DEIS states that if the USFS does not issue the road easement special use permit for construction of a road to Cascade Point, development at Cascade Point would likely still occur. The DEIS then evaluates environmental consequences under Alternative B and C, given that the no-action alternative would include impacts of development of a road on Goldbelt land and state tidelands. However, the DEIS (page 4-7) also states that although the beach alignment would be feasible, it may be environmentally unacceptable. The DEIS states that storm water control would be costly and possibly not effective so near to the water and that the route would not be consistent with the ACMP. Water access has always been available for the applicant, but this form of access has not yet fostered development at Cascade Point. Consequently, we believe that the no-action alternative should not include the environmental consequences of these other actions. This DEIS should only evaluate the environmental consequences of access alternatives. Alternatives that are obviously inconsistent with the ACMP should be eliminated from further consideration in this NEPA review.

74.3

Response to Comment 74.2

We have added these requirements to the Final EIS, Chapter 1, Other Laws and Permits.

Response to Comment 74.3

The purpose of this document is disclosure of environmental effects. In this case the No Action Alternative has possible consequences that, although outside the jurisdiction of the Forest Service, must still be discussed. Please see response to Comment 29.1.

Response to Comment 74.4

Please see response to 64.16.

Page 2-2, Alternatives Eliminated from Detailed Study

The DEIS indicates that Goldbelt could build an access road on its land within 100 to 200 feet of the beach with less National Forest land, but that this alignment was eliminated from further study. The DEIS indicates that this alignment would involve less wetlands. It is not clear why this alternative was not evaluated pursuant to NEPA. This alternative would involve less public land and may have less adverse impacts. The DEIS provides no rationale for this decision. We recommend that this alternative be evaluated in this NEPA process unless adequate reasons are provided to show that it is not a reasonable alternative.

74.4

This DEIS no-action alternative states that it is reasonable to assume that Goldbelt will develop its land at Cascade Point, regardless whether a road across USFS land is implemented or not. Because of this, Table 2-2 and Chapter 4 indicate that the no-action alternative would result in relatively large percent carrying capacity reductions in wildlife compared to the action alternatives. The reader should not be confused by selectively including impacts that have nothing to do with the proposed project alternatives. We recommend that this DEIS just analyze the proposed road project, and not include Goldbelt's potential Cascade Point developments. Goldbelt's proposed Cascade Point developments and other actions in the reasonably foreseeable future should be reserved for the discussion of cumulative impacts. If they are included in the no-action alternative, a thorough analysis of alternatives and environmental consequences for that part of the project must be included in the NEPA evaluation.

74. 5

Page 3-5 to 3-8, Wildlife

It is not surprising that there are some inconsistencies between the interagency goat model and specific goat locations documented by Fox (1979). The habitat capability model was constructed for the purpose of region-wide planning and is based on some rather general assumptions. It was never intended to be used for site-specific planning and in any case is limited by the accuracy of mapping such components as cliffs and vegetation type. We have found that cliffs, for instance, are not even detected in some cases. We recently tested this model as a possible way to help pick low-conflict helicopter routes. When the model was tested against radio-location data, we found that there was not good correlation at a site-specific level, although in the regional context, the model did show areas potentially used by goats. This does not make the model wrong, but means its use should be restricted to what it was intended for. It seems that the pertinent point is that Fox (1979) did document goat use on the ground in this location, which makes the accuracy of the model moot.

ADF&O has radio-location data from the Lion's Head Mountain area (along Lynn Canal north of Berners Bay) documenting goat use very close to sea level in the early spring of a moderate winter, so finding goats in timber at low elevations is not all that rare or surprising. Whether or not the winter of Fox's study was especially severe (and it is unclear whether the authors have determined that it was or are merely saying that it could have been), the fact remains that goats used the Cascade Point area. Even if this area is only used by goats in severe winters, that is the condition that needs to be under consideration. An area can be rated as "low-quality" winter range in terms of forage and escape terrain, but in times of severe weather and deep snow, such an area may be the best, and last, place the animals can go. Consequently, we believe that the estimated reduction of mountain goat carrying capacity would be greater than the DEIS indicates for each of the action alternatives.

74. 6

Response to Comment 74.5

Please see response to comment 19.1.

Response to Comment 74.6

Please see the Final EIS, Chapter 3, Wildlife, for revision to address some of the points expressed in your comments.

Even though the interagency models were developed to evaluate impacts on a region wide management level, and the models may not be sensitive to small geographic features that may impact species use if the area, we feel they still have a value in determining relative impacts among project alternatives.

The presence of wintering mountain goats along part of the proposed road during the Fox study does not necessarily find fault in the interagency model which lists this as low quality winter habitat. It appears as though mountain goats use this area during some winters. The mention of the possibility of a severe winter being the reason for mountain goats using the area has been removed from the document. We have since learned that during the winter this study was conducted, the Juneau area had a snowfall slightly below average. It appears as though mountain goat use of this area is independent of winter severity (as defined by total snowfall). See the Final EIS, Chapter 3 and 4 for portions of the Wildlife sections that have been modified due to your comments and this new information.

We also believe that the indicated reduction in carrying capacities for bears may be underestimated. The Sawmill Creek and Cowee Creek drainages are regularly used as feeding areas by both species of bears, but mostly black bears. Cowee Creek is a spring feeding area because of all the meadows and there is some concentration there in fall, too, as the fish run. Bears concentrate on Sawmill Creek mainly in the fall. Development will have several effects. First, it is likely that there will be some reduction in existing hunting opportunity at Sawmill Creek, due to proximity to structures/residences. Secondly, the presence of workers/residences in the area will probably eventually increase hunting pressure where hunting is allowed, and could possibly result in too high a harvest. Thirdly, remote developments such as this typically create new "garbage bears". Nuisance animal complaints will result in bears being killed, either through unreported kills, defense of life and property kills, and/or by ADF&G. These kills will add to any increase in hunting mortality. Additionally, there will be some degree of additional workload related to relocating problem bears.

74.7

Page 3-8, Fish

The fourth paragraph does not adequately reflect the status or the potential of herring stocks in this area. The DEIS seems to imply that there is little habitat for herring in this area and that the stocks are growing. During the 1970s, Auke Bay to Berners Bay herring catch ranged from about 300 to 1,000 tons. Currently, the Lynn Canal/Juneau herring stocks are very weak and no harvest has been allowed since 1982. Since 1982, the annual estimate of this stock's size (2-5 million pounds since 1983) has not been great enough to support a commercial fishery. ADF&G estimates that a minimum stock size of 10 million pounds is the threshold needed for population viability. Despite a lack of harvest this herring stocks has declined further. Partly because of shoreline development, the nautical miles of spawn between Auke Bay and Berners Bay has decreased substantially. Spawning activity for this remnant stock is now centered within Berners Bay. In-water disturbances must be avoided during the April-May herring spawning and incubation period to ensure survival of this stock.

74.8

Page 3-10, Recreation - Visual

The DEIS provides information regarding hunting activity and non-hunting wildlife use in the Berners Bay area. It then states that is reasonable to assume that the area will become more popular for recreation activities as the state continues to upgrade Glacier Highway. The DEIS should not imply that hunting activity or non-hunting wildlife opportunities will increase. These two activities will be impacted because both habitat capability and sustainable yields will decrease in the area of the road corridor.

74.9

Page 4-1 to 4-4, Impacts to Wildlife

As discussed above, the DEIS discusses estimated reductions in carrying capacity as a result of the three alternatives, but provides no measures to mitigate for these impacts.

74.10

Response to Comment 74.7

The Management Indicator Species (MIS) models use the same parameters to estimate impacts that you mention in your comments.

Response to Comment 74.8

See response to Comment 29.7.

Response to Comment 74.9

We have removed this statement from the document. The habitat impacted by the development of the road is relatively minor compared to the habitat at Sawmill Creek, Cowee Creek, and Berners Bay. Relative to these places, the road corridor is not likely an important area for hunting or wildlife watching. This area already receives disturbance impacts from boat traffic going to and from the Echo Cove public boat ramp. The use of the area's wildlife resources will likely continue to increase as the state makes improvements to the Glacier Highway. In time, consumptive and non-consumptive wildlife uses may be impacted more by overuse than habitat losses associated with this project.

Response to Comment 74.10

Mitigation measures discussed in the Final EIS, Chapter 2 include using an appropriate seed mixture along the road and other disturbed areas in order to reduce the likelihood of attracting wildlife. Other wildlife impacts associated with habitat loss and human use of the area would be difficult for the Forest Service to implement as most of the potential impacts are on private land.

We recommend that only native plant materials be used to stabilize areas disturbed as a result of road construction. Locally adapted plants have greater survival will prevent the spread of unwanted exotic species.

Page 4-7 to 4-8, Wetlands

The DEIS proposes measures to mitigate wetland impacts that include avoidance and minimization. The sequence of avoidance, minimization, and mitigation for each wetland complex must be described more thoroughly when the Goldbelt applies for permits. Wetland mitigation generally consists of restoring impacted wetlands, enhancing existing wetlands, or creating new wetlands. After avoidance, on-site, in-kind mitigation of wetlands should be the first option for mitigation. Therefore, the DEIS does not propose any mitigation of wetlands. We recommend that a close evaluation of mitigation opportunities be conducted in the project-affected area.

Thank you for the opportunity to comment. Questions regarding our comments should be directed to me at (907)465-4289.

Sincerely,

Clayton R. Hawkes
Clayton Hawkes
Area Habitat Biologist

cc: R. Thompson, Army Corps of Engineers •
J. Garland, Division of Governmental Coordination •
W. Smith, CBI, Community Development •
A. Pekovich, Alaska Department of Natural Resources •
M. Conway, Alaska Department of Environmental Conservation •
N. Holmberg, U. S. Fish and Wildlife Service •
S. Zimmerman, National Marine Fisheries Service •
M. Jen, U. S. Environmental Protection Agency •
ADF&G, Juneau Review Staff •

• e-mail

Response to Comment 74.11

The Draft EIS, Chapter 2, Mitigation, Visuals states that there will be "Use of native species of plants to re-vegetate exposed cut and fill slopes"

Response to Comment 74.12

Please see response to Comment 29.9.



February 6, 1998
[Faxed 2/9/98; original mailed 2/9/98]

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. de Leeuw:

I would like to submit the following comments of support for the Cascade Point Access Road. The JEDC considers this proposed project consistent with the City and Borough of Juneau's Comprehensive Plan. Further, the Goldbelt Echo Cove lands are designated "New Growth Area," and it has been CBJ policy to encourage development in this area.

Although the USFS stated in Alternative A that the applicant could build a road across its own property adjoining tidelands if this access is denied, the JEDC recognizes the difficulty in permitting such a project and would like to point out that this proposed easement would greatly reduce likely impact to the environment should Goldbelt have to confine the road to its own land.

We have observed that Goldbelt, Inc., is a good corporate citizen with local Native community leaders serving on its board, and as such, will make every effort to carry out their development plans in a conscientious manner. The future plans for development in the area, albeit contingent on many economic factors, would provide good public access with public amenities.

I am satisfied that the DEIS has identified and addressed the various potential impacts of the project and that the mitigation proposed will be appropriate. The habitat impacts noted in the DEIS are minimal for this project. Given Goldbelt's record of environmental sensitivity, the impacts could be even less.

For the reasons stated above, I am providing these favorable comments in support of the request made by Goldbelt, Inc.

Sincerely,

Charles Northrip
Executive Director

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FEB 10 1998

JUNEAU, AK

Response to Comment 75.1

Please see response to Comment 14.2

Response to Comment 75.2

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

Response to Comment 75.3

Thank you for your comment.

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

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FEB 10 1998
Juneau Ranger
District
February 8, 1998

Dear Ms. De Leeuw:

The Juneau chapter of the National Audubon represents a diverse section of the community whose interest are for the continual health of habitats that support a wide variety of wildlife. As proponents of protecting and preserving habitat and wetlands we would like our comments to be considered on the Draft Environmental Impact Statement (EIS) for Cascade Point. This EIS considers options for Goldbelt to access private land by crossing National Forest lands near Echo Cove, Alaska. Our review leads us to conclude that not all practicable and feasible alternatives were considered as required by Title 42, Section 4332(E) of the National Environmental Policy Act of 1969 (NEPA). Specifically, the EIS considers only two options, road access or no road access. NEPA is clear in requiring a range of options. We believe that there are practicable and feasible alternatives that could have been considered but were not. We also believe that the Forest Service thorough historic interaction has set a precedence for how Goldbelt Corporation and its operators have been treated. The past interactions between Goldbelt and the Forest Service have favored Goldbelt at the expense of public funds and resources.

Alternative Analysis

The EIS failed to consider a range of alternatives, especially an option that maximizes public benefit while allowing the applicant a practicable alternative. Under NEPA Section 102(E), the Forest Service is required to "study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." Clearly, this action is for the sole benefit and economic gain of Goldbelt Corporation. The public does not benefit from this action, and is not compensated for the loss of forest habitat and resources. In fact, the EIS considered barring public access to this road during certain times of the year. We feel that the Draft EIS should be revised to include an option that could benefit the public. For example, land trades between the Forest Service and the applicant were cited (Laura Creek in Hobart Bay lands for Echo Cove lands). A possible alternative could have examined a land trade that would have eliminated the need to cross public lands. We feel that lands along the shoreline would be a benefit to the public if the current road alignment were more protective of habitat. At a minimum, the EIS must consider an alternative that compensates the public for this action. After all, we are sure that Goldbelt would want the same if the situation were reversed.

RESPONSES TO COMMENTS

Commentor No. 76: Chris Kent, Juneau Audubon Society

Response to Comment 76.1

To be considered reasonable all alternatives must meet the purpose and need of a project (except No Action) and address significant issues. These were the standards used to formulate the alternatives for this EIS. Please refer to Chapter 2, Alternatives for an explanation of the alternatives that were analyzed and those that were not carried forward.

Response to Comment 76.2

Please see response to Comment 76.1 regarding the range of alternatives. Also see comment letters received in response to scoping for the Draft EIS.

Some commentors on this EIS expressed what they see as positive aspects of this project. In addition, Goldbelt, Inc. and their shareholders will benefit from this project and they are members of the public.

Other commentors stated that they see no public benefit from this road except for Goldbelt, Inc. Very few projects will benefit all segments of the public nor is this a requirement. For instance, building a trail benefits the segment of the public that will use it. However, it may open or increase access to an area that others would prefer to leave undeveloped. Still others will not use the trail and would rather see the funds used to develop other projects. Still more would be concerned about effects on wildlife from increased access. All these concerns must be taken into account by the decision maker when deciding whether to proceed with the trail while acknowledging there will not be a benefit to everyone.

The interaction of the Forest Service with Goldbelt was defined during the development of the Hobart Bay area. The Forest Service was requested on numerous occasions for access to National Forest lands to allow the placement of tiebacks for high-lead logging. In all instances, the Forest Service denied Goldbelt's request. However, the Forest Service gave Goldbelt considerable funds to improve roading within the Hobart Bay. For example, the areas known as the "Sand-point" was improved with monies directly obtained from the Forest Service. The total amount of engineering time and monies the Forest Service "gave" to Goldbelt exceeded over \$250,000 (Rich Dwyer, 1991). The justification given was that this road might have some future use to the Forest Service. The Forest Service also gave Goldbelt "road" credits in the Port Houghton area in anticipation of future National Forest timber harvest (Port Houghton/Cape Fanshaw EIS, 3/96). In short, the public has invested considerable funds into past Goldbelt roading practices without compensation or benefit. The Forest Service, while supporting roading activity, has in the past denied access to National Forest Lands. We seek a policy of public compensation for losses to public domain and a reimbursement of public funds. This roading project must not be another "give-away" of public land.

Response to Comment 76.3

Goldbelt, Inc. is not acquiring the road but will be granted an easement for use of National Forest System land. Use of the road will not be exclusive to Goldbelt, Inc., but will be open to the public. Cost of design, construction, and maintenance will be the responsibility of Goldbelt, Inc.

Response to Comment 76.4

The range of alternatives considered in the document was developed based on the Purpose and Need and issues identified during the scoping process.

We encourage the Forest Service to amend the current Draft EIS with alternatives that are more favorable to the public domain and its resources. A revised EIS should be prepared and presented to the public. Thank you for allowing us to comment.

Sincerely yours,



Chris Kent
Conservation Chair
Juneau Audubon Society

RESPONSES TO COMMENTS
Commentor No. 77: Ed Grossman, Fish Tale Alaska Wilderness
Adventures

FISH TALE
ALASKA WILDERNESS ADVENTURES
P.O. Box 35361
Juneau, AK 99803

February 9, 1998

RECEIVED

FEB 10 1998

Juneau Ranger
District

Karen Mollander
District Ranger
Juneau Ranger District
U.S. Forest Service
Tongass National Forest
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. Mollander:

This letter is in opposition of the proposed Cascade Point Access Road.

I am very disappointed at the blatant, predisposed position the Forest Service has taken in favor of the proposed road to Cascade Point. The Environmental Impact Statement for this project must have been written with a set of blinders on the author. The EIS ignores the basic fact that this road and the ensuing development, as described in the Goldbelt Master Plan, are inextricably linked. These actions will cause the unraveling of the wilderness character of the entire Berners Bay area, a Congressionally designated LUD II. Many other lands have had their wilderness character destroyed as a trade off for lands, such as LUD II's, that have been set aside by Congress. Have these sacrifices been made in vain? A prudent land manager, applying the principles of ecosystem management, cannot ignore the fact that this action does not stand alone, and its resultant negative impacts will ruin the integrity of Berners Bay.

77.1

Response to Comment 77.1

Please see response to Comment 4.1 and 24.1.

Response to Comment 77.2

Please see response to Comment 64.12 and 73.6.

Response to Comment 77.3

Thank you for your comment. The Forest Service has no jurisdiction over activities on private land.

Response to Comment 77.4

The No Action Alternative is a viable alternative in this analysis. Please see rationale for decision in the Record of Decision.

The remnant herring stocks, and the Spring eulachon run alone make this area stand out as biologically important and unique. This watershed provides important habitat for many species of wildlife such as bears, mountain goats, wolves, and wolverine all of which are dependent on limited access and vast tracks of wilderness. The marine mammal, and bird diversity here is also noteworthy. The sightseeing, fishing, crabbing, and hunting are well renowned. This is my favorite place in the Juneau area to take clients. These visitors and their values should receive equal treatment as you formulates your decision on this road. All the resources and user groups described, will be negatively impacted by the planned development at Cascade Point.

77.2

Goldbelt is a discriminatory organization, thus they should not be accommodated at the cost of other Berners Bay users. Hobart Bay, north Douglas Island, and the Lemon Creek valley are a few examples of how they treat their land; and one only needs to read the signs to find out that only shareholders are welcome. Such discrimination and poor land management practices will likely continue in Berners Bay.

77.3

Please remember that you represent the people of the United States...Not just Juneau residents, and not just Goldbelt shareholders. This action is not in

77.4

the interest of those who will not see a profit from its development. As stated in the EIS, in the absence of a Forest Service permit, Goldbelt has other options to pursue the access they desire.

I remain hopeful that you will carefully review the facts and issues for the entire Berners Bay area and decide against permitting the road to Cascade Point.

Thank you for the opportunity to provide comments.

Sincerely,



Ed Grossman
Owner/Operator

Headquarters:
217 2nd Street, Suite 201
Juneau, Alaska 99801
(907) 586-2323 FAX 463-5515



Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

RE: Cascade Point Access Road EIS

Dear Ms. de Leeuw:

The Alaska State Chamber of Commerce supports Proposed Action B of the Cascade Point Access Point Access Road EIS.

The project impacts have been identified and thoroughly addressed, and responsible mitigation measures for the identified impacts have been proposed.

Development at Cascade Point has high potential for improving transportation links within the northern region of Lynn Canal. The proposed development is planned for private land, and the Alaska State Chamber of Commerce strongly believes that private property use should not be unreasonably restricted. Although the road alignment is on Forest Service land, the alignment suggests an expectation of a right-of-way for access and development in the area.

Sincerely,

Pamela La Bolle

Pamela La Bolle
President

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FEB 10 2000

Juneau, Alaska

RESPONSES TO COMMENTS
Commentor No. 78: Pamela La Bolle, State Chamber of Commerce

Response to Comment 78.1

Thank you for your comment.

Response to Comment 78.2

Please see response to Comment 14.1.

Response to Comment 78.3

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority and policy regarding access to private land.

Response to Comment 78.4

Please see response to Comment 14.3



ALASKA ELECTRIC LIGHT AND POWER COMPANY

(907) 740-2722 FAX (907) 463-3304
5601 Tongard Court, Juneau, AK 99801-7201

RESPONSES TO COMMENTS
Commentor No. 79: William A. Corbus,
Alaska Electric Light and Power Company

February 9, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Re: Goldbelt, Inc. Proposed Action of Building 2.5 Mile
Access Road to Cascade Point

Dear Ms. De Leeuw:

The Alaska Electric Light and Power Company (AELP) supports proposed Action B, the Forest Service Preferred Alternative, for the Access Road to Cascade Point. It is consistent with the City and Borough of Juneau's Comprehensive Plan adopted in 1984. AELP has followed the Forest Service's process and feels all Project impacts have thoroughly addressed.

79.1

Very truly yours,

William A. Corbus

William A. Corbus
President

Response to Comment 79.1

Thank you for your comment. Please also see response to Comment 14.2.

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FEB 10
JUNEAU RANGER

Jennette de Leeuw
Juneau Ranger District
8465 Old Navy Road
Juneau, Alaska

Feb. 9, 1998

RECEIVED

FEB 10 1998

Juneau Ranger District
DEAS

Re. Cascade Port Access Road DEAS

Ms. de Leeuw:

I oppose construction of this road. I believe that public or private extension of Glacier Highway past its current terminus at Eder Cove is not in the best interest of this community, Barrow Bay, Alaska or this nation. I support a true No Action alternative and denial of wetlands fill permits for the proposed alignment or other possible alignments.

The selection of alternatives is improperly limited. All potential road alignments should have been evaluated and deemed as alternatives. Regardless of self-imposed Forest Service limits on the scope of alternatives studied, a major federal action requiring an Environmental Impact Statement (US Army Corps 404 permit) will still be required in order to approve any upland access route. The Forest Service decision not to include all potential upland access routes in the EIS creates an unreasonable and illegal segmentation of review.

By not studying alternate road routes the Forest Service
p. 1

80.1

RESPONSES TO COMMENTS
Commentor No. 80: Aaron Brakel

Response to Comment 80.1

The Forest Service Record of Decision provides the rationale for the selected alternative. Please see response to Comment 18.3.

Response to Comment 80.2

The range of alternatives considered in the document was developed based on the Purpose and Need and issues identified during the scoping process. Please see the Final EIS, Chapter 2, Alternatives Eliminated from Detailed Study for an expanded discussion.

Response to Comment 80.3

Please see responses to Comments 11.4 and 28.3.

80.2

80.3

also creates the pretense^{that} the proposed developments at Cascade Point are not direct impacts of the access road and need not be reviewed in detail in the EIS. The types of development at Cascade Point and their associated impacts are wholly dependent on construction of road access, therefore making the proposed developments these connected actions.

80.3

All impacts of the Cascade Point developments must be included as direct impacts. Failure to do this creates an unreasonable separation of review.

80.4

Response to Comment 80.4

The environmental effects of the proposed development at Cascade Point are disclosed in the Final EIS, Chapter 4, Consequences.

Response to Comment 80.5

Thank you for your comment. Only the document *Cascade Point Access Road Draft EIS* exists. We have made the needed corrections.

The Cumulative Effects section of the Summary (p. 5-12) refers to a "Cascade Point and Development Draft Environmental Impact Statement." I am not familiar with this document. Is this the same as the "Cascade Point Access Road DEIS"? Several references in Chapter 6 (References) refer to a "Cascade Point Draft Environmental Impact Statement", and one refers to a "Cascade Point Access Road and Development Draft Environmental Impact Statement." This is very confusing. Is there another document I should be looking at to try to understand and comment on impacts from development at Cascade Point? Is this more segmentation of review or was the Forest Service, in an earlier stage of site study of this ~~not~~ project, acknowledging its responsibility to include impacts from Cascade Point development?

80.5

I sincerely hope that the Forest Service reverses its
current direction and ceases to collide with this
ill-conceived plan for industrial development of Barrow
Bay. Whether I or others use Barrow Bay or not,
there is tremendous value in knowing it is there,
undeveloped and intact. This value is spiritual,
its cultural and its economic. I challenge the
Forest Service to come up with a better method of
protecting the value. Inuvait, Alaska and
all Alaskan place or having a place as invisible
as Barrow Bay. Intact and free from industrial
development. Such places as this make heart-
sing and fill even the mighty with peace and awe.

80.6

Response to Comment 80.6

The Forest Service Record of Decision provides the rationale for the
selected alternative.

Response to Comment 80.7

Please see response to Comment 29.1

With respect for you and our beloved
planet,

Anton Brakel

422 East St.
Juneau, Alaska 99801

p.s. The Forest Service failure to include other road routes makes the
EIS's No Action Alternative not a true "No Action" Alternative. This is in
violation of the National Environmental Policy Act. Give us a Real
No Action Alternative. p. 3

80.7

Dennis L DeWitt
PO Box 34761
Juneau, AK 99803
907-789-2626

RESPONSES TO COMMENTS
Commentor No. 81: Dennis L. DeWitt

February 9, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

250-1111

FEJ 1111

Juneau Ranger
District

Dear Ms de Leeuw:

I support "proposed Action B", the Forest Service Preferred Alternative for the 25 mile access road to Cascade Point for the following reasons:

- | | |
|------|--|
| 81.1 | 1. The development of the proposed road is consistent with the CBJ Comprehensive Plan. |
| 81.2 | 2. The U.S. Forest Service road alignment anticipates a road for access to land in this area. |
| 81.3 | 3. The development of Cascade Point would enable improved marine transportation in the Lynn Canal. |
| 81.4 | 4. The Gold Belt development would be in land designated for new growth in the CBJ Comprehensive Plan. |
| 81.5 | 5. The Development will have minimal impact on Echo Cove. |
| 81.6 | 6. The project impacts have been identified and appropriate mitigation is proposed. |

Thank You for your consideration.



Dennis L DeWitt

Response to Comment 81.1

Thank you for your comment.

Response to Comment 81.2

Please see response to Comment 14.2.

Response to Comment 81.3

Please see response to Comment 14.3.

Response to Comment 81.4

Please see response to Comment 14.1.

Response to Comment 81.5

Please see response to Comment 14.2.

Response to Comment 81.6

Thank you for your comment.

February 9, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Dear Ms. de Leeuw:

I have had the opportunity to examine the helicopter-logging project of Goldbelt in the Echo Cove area. I have viewed this project of resource management from a boat and overhead, from a helicopter, and am very impressed. I spoke with the forester in charge of the project and the practices that Goldbelt imposed to make sure that minimal visual impact are maintained were described to me. As a result of these practices even fewer trees were cut than planned or allowed. What is more, Goldbelt instructed the forester to go beyond the required regulations and increase buffer zones surrounding creeks and eagle nest.

Goldbelt is a company that has demonstrated their commitment to responsible operations in sensitive areas. Their development a Cascade Point will be managed under the same commitments.

The development at Cascade Point meets the conditions of National Forest Service policy which favors provision of access to privately held land if it will promote economic opportunity to the land owner or if it will improve transportation access. Housing, tourist and recreational services, and a potential high-speed ferry terminal are included in the Cascade point development plan.

In addition, the Cascade Point development fulfills the intent of the Alaska Native Claims Settlement Act in providing economic and employment opportunities for the Native Shareholder of Goldbelt.

For the above reasons I support the USFS preferred alternative Proposed Action B, and the development of the proposed 2.5 mile access road to Cascade Point.

Sincerely,

David Harvey

David Harvey

RESPONSES TO COMMENTS
Commentor No. 82: David Harvey

Response to Comment 82.1

Thank you for your comment.

Response to Comment 82.2

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority and policy regarding access to private land.

Response to Comment 82.3

Please see the previous comment response.

Response to Comment 82.4

Thank you for your comment.

82.1

82.2

82.3

82.4

FEB 11 1998

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS & OUTDOOR RECREATION - SOUTHEAST

TONY KNOWLES, GOVERNOR

MAILING ADDRESS:
400 Wainwright Avenue
JUNEAU, ALASKA 99801-1381
PHONE: (907) 485-4563
FAX: (907) 485-5330
Email: separto@alaska.net

RESPONSES TO COMMENTS
Commentor No. 83: William W. Garry; Department of Natural
Resources, Division of Parks and Outdoor Recreation

February 9, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Dear Jennette de Leeuw:

The Southeast Area Office of the Division of Parks and Outdoor Recreation has one specific concern with the cumulative effects of development of the proposed Cascade Point Access Road. Because the associated development at Cascade Pt. will require diesel generation of electricity, the sound produced will easily travel over the water to be heard at our two public use cabins in Pt. Bridget State Park. Especially the cabin at Pt. Bridget called Blue Mussel Cabin will be subject to 24-hour noise across the water which, although below 55 dBA at nighttime, will significantly intrude upon the quiet nighttime sounds of birds, animals, and ocean that our cabin renters have come to enjoy and expect.

83-1

This road project will not directly affect the park users' expectation of quiet nighttime solitude, so I have no comment on the road itself. If there were some way to make it clear that any diesel generation equipment without extreme muffling devices would seriously alter the peace and serenity of the nighttime, I would appreciate this included in the Environmental Impact Statement. The statement in the Draft EIS on page 4-24 about Noise may be factually correct, and the noise level may end up being below the required 55 dBA during the nighttime. This does not mean the drone of diesel generators will not destroy the existing levels of quiet and peaceful nighttime sounds. Many people rent our cabins to escape the acceptable levels of noise within a city subdivision along roads and streets to experience the subtle nighttime sounds such as whales singing, bird wings flapping, and small waves lapping at the shore.

Thank you for the opportunity to comment on this project.

Sincerely,



William W. Garry
Area Superintendent

cc: Juneau State Parks Citizens Advisory Board

Response to Comment 83.1

As stated in the Final EIS in Chapter 4, the noise analysis showed no detectable increase in sound levels at either Point Bridget State Park or Sawmill Creek. The technical report discussing the noise study is available in the planning record.

RECEIVED
FEB 11 1998



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: ECO-088

Ms. Jannette de Leeuw
Juneau Ranger District
Tongass National Forest
8465 Old Dairy Road
Juneau, Alaska 99801

February 9, 1998

Ref: 96-052-AFS

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FEB 12 1998

Juneau Ranger
District

Dear Ms. de Leeuw:

The Environmental Protection Agency (EPA) has completed its review of the draft Environmental Impact Statement (EIS) for the proposed Cascade Point Access Road in accordance with its authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The draft EIS has been prepared by the Forest Service in response to a request by Goldbelt, Inc. for a road easement to access their land in Echo Cove, which is located approximately 42 miles north of Juneau, Alaska. The draft EIS identifies a road across National Forest System land (Alternative B) as the preferred alternative of the Forest Service.

Based on our review and evaluation of the draft EIS and other information sources, we have assigned a rating of EO-2 (Environmental Objections - Insufficient Information) to the draft EIS. This rating, and a summary of our comments, will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference.

Our objections are based primarily on a Purpose and Need statement that results in the evaluation of a restricted range of alternatives, and potentially significant direct, indirect, and cumulative environmental impacts to Berners Bay. We believe that the EIS needs a significant amount of additional information in order for it to meet its fundamental role as a disclosure document. We recommend that more information (including an assessment of impacts) about reasonably foreseeable development at Cascade Point be included to better reflect the development described in the Echo Cove Master Plan. Because the proposed action would result in the direct impact to wetlands, we also believe that additional information is needed to demonstrate that the proposed access road is the least environmentally damaging practicable alternative through the analysis of additional alternatives. We also recommend that the cumulative impacts analyses be expanded and suggest the use of the Council on Environmental Quality's handbook on cumulative effects analysis be consulted.

These issues, along with others that we believe need to be addressed in the EIS, are discussed in greater detail in the enclosure to this letter. Should significant new information be developed in responding to comments of the draft EIS, a supplemental draft EIS would be the

Response to Comment 84.1

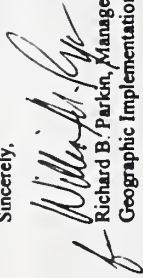
See the following specific comments for Comment letter 84.

appropriate mechanism for informing the public and the decision maker of alternatives to, and potential consequences of, actions to be taken by the Forest Service on the proposed action.

We are interested in working closely with the Forest Service in successfully resolving the issues we have identified above and elaborated on in our enclosed detailed comments. I urge you to contact Bill Ryan at my staff at (206) 553-8561 at your earliest opportunity to discuss our comments and how they might best be addressed for the project. Please note that we are currently reviewing the Army Corps of Engineers' Public Notice of Goldbelt's application for a permit for the proposed road and log transfer facility. We will be providing you a copy of our comments on the Public Notice, as we anticipate that they will be directly applicable to the proposal the Forest Service is presently evaluating.

Thank you for the opportunity to provide comments on the draft EIS.

Sincerely,



Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosures

cc: Ralph Thompson, US ACOE-Juneau
Nevin Holmberg, USFWS
Steve Pennoyer, NMFS
Clayton Hawkes, ADFG
Diane Mayer, ADGC

**EPA Comments on the
Cascade Point Access Road
Draft Environmental Impact Statement (EIS)**

General Comments

In general, we find the draft EIS fails to adequately meet the fundamental purpose of the National Environmental Policy Act (NEPA) to "insure that environmental information is available to public officials and citizens before decisions are made and actions are taken" (see 40 CFR 1500.1(b)). The EIS does not provide sufficient information to provide the reviewer an understanding of the nature of the development that Goldbelt is proposing for Cascade Point, how development would differ with the implementation of the alternatives presented in the EIS, and the environmental consequences that would result with the implementation of each alternative. While we understand that the Forest Service does not regulate activities on private lands, the implementing regulations for NEPA direct federal agencies to disclose all impacts that would result as a consequence of their actions, regardless of whether they are under the control of the lead agency (40 CFR 1508.8). We recommend that the EIS be revised to include an expanded discussion of the Goldbelt development plan for Cascade Point (such as the description in Chapter 8 of the Echo Cove Master Plan) and a discussion/analysis of the environmental consequences, both direct and cumulative, associated with the implementation of the Master Plan.

We find that the EIS does a very poor job of identifying and integrating information relevant to the proposed action and needed by reviewers to provide meaningful input on the proposal. We have used information contained in the draft EIS, the Echo Cove Master Plan and the Army Corps of Engineers Public Notice, and the Juneau Access Improvements Project draft EIS in the development of our comments on this EIS. Each of these documents contains different, but important, information needed to understand the proposal being evaluated by the Forest Service. We view the EIS as the appropriate place for such information to be presented, integrated, and evaluated. We recommend that the EIS be revised to better present and integrate information that relates to the decision to be made by the Forest Service, and reveals impacts associated with the potential decisions.

Purpose and Need

We believe that the Purpose and Need statement presented in the draft EIS is stated in a manner that places extremely narrow constraints on the range of alternatives that are currently under consideration by the Forest Service. The implementing regulations for NEPA clearly state that an EIS "shall briefly specify the underlying purpose and need to which the agency is responding" (see 40 CFR 1502.13). We believe that the present Purpose and Need statement does not reflect the underlying need for the proposed action, which is simply to provide Goldbelt, Inc. access to their land. While Goldbelt has identified the proposed action as their desired solution to their need for access, we feel that the inclusion of the phrase "across National Forest System land" in the Purpose and Need statement restricts serious consideration and evaluation of alternatives to Goldbelt's proposal. We recommend that the Purpose and Need statement be

1

Response to Comment 84.2

Please see Final EIS, Chapter 1, Area Planning and Management, Goldbelt, Inc. for clarification of the description of the proposed Goldbelt, Inc. development as described in the Echo Cove Master Plan. The contents of the Master Plan are incorporated into the EIS by reference. Please see response to Comment 11.4.

Response to Comment 84.3

Council of Environmental Quality (CEQ) regulations for implementation of the National Environmental Policy Act (NEPA) direct federal agencies to prepare analytic rather than encyclopedic environmental impact statements and to incorporate other environmental documents by reference. These documents are in the planning record.

Response to Comment 84.4

Goldbelt, Inc. applied for a federal permit of a road easement across National Forest System land. This proposal became the Forest Service Proposed Action. The Purpose and Need is for the federal action of issuing the road easement. The responsibility of the Forest Service is to consider proposals affecting National Forest System land. There would be no underlying need for this analysis if National Forest System land were not involved.

revised to read:

84.4 The purpose of the proposed project is to provide Goldbelt, Inc. access to their land at Cascade Point.

Alternatives

We believe that the draft EIS has presented an extremely narrow range of essentially two (2) alternatives, a no-action alternative and a single road-access alternative. This narrow range of alternatives appears to be directly related to the inappropriately narrow Purpose and Need statement presented in the draft EIS (see preceding comment). We feel that the range of reasonable alternatives warranting rigorous evaluation in the EIS extends beyond those currently under consideration by the Forest Service. Consequently, we recommend that the EIS be revised to address the comments that follow.

Alternative A - No Action

84.5 It appears that the term "no action" being used in the EIS is intended to mean that the Forest Service would be taking no action on Goldbelt's request for a road easement (i.e., not grant the easement). We recommend that the manner in which the Forest Service is using "no action" be clearly stated in the EIS as it has significant implications on the range of alternatives that should be addressed in the document.

84.6 More importantly, we find that the use of the term "no action" in this EIS results in a document that seems to "lump" a number of seemingly reasonable and feasible alternatives into a convenient catch-all category, without rigorously evaluating them as specified at 40 CFR 1502.14(a). The present treatment of the "no action" alternative also seems to be avoiding the evaluation of seemingly reasonable alternatives that are not within the jurisdiction of the Forest Service, contrary to the direction provided at 40 CFR 1502.14 (c). Page 2-2 identifies three (3) alternatives to accessing Goldbelt's land that are characterized as being both "Alternatives Eliminated from Detailed Study" and "available to Goldbelt, Inc., if the road easement permit were not granted" (i.e., "no action"). The No Action alternative(s) cannot be eliminated from detailed study simply because it/they would not fall within the jurisdiction of the Forest Service. We believe that because the following alternatives are reasonably foreseeable outcomes associated with a "no action" decision by the Forest Service, they must each be rigorously explored and objectively evaluated in the EIS to satisfy 40 CFR 1502.14(a), (c), and (d):

- Access road close to the beach
- Access road using no National Forest System lands
- Marine Access

Alternative C - Access Road Across National Forest System Land with No Public Access

84.7 We do not support this alternative, as it would result in essentially a private road for Goldbelt's exclusive use. We do not believe that authorizing the construction and use of a road that is on, and would provide access to, Forest system lands would be in the best interest of the public if the general public is restricted from using it.

Response to Comment 84.5

Please see response to Comment 29.1.

Response to Comment 84.6

The purpose of alternatives is to address issues. The No Action Alternative was not eliminated from detailed study. The Final EIS, Chapter 2, Alternatives Eliminated From Detailed Study explains why options for access off National Forest System lands were not carried forward as separate alternatives. They are included in the No Action Alternative and the effects are described in Chapter 4. An access road close to the beach or off National Forest System land would not address any of the significant issues.

Response to Comment 84.7

The Forest Service Record of Decision provides the rationale for the selected alternative.

Berners Bay Cumulative Effects

Berners Bay is an area with high resource and recreational value, and is vulnerable to direct and indirect impacts from the proposed action. Along with the Cascade Point Access Road and subsequent development by Goldbelt, there are other major development proposals (e.g., Kensington and Jualin mines, Juneau Access Improvements project, Lace River Hydro project, timber harvest and associated roads and log transfer facilities) that would all impact Berners Bay. As presently written, the draft EIS does not adequately address the potential cumulative effects of all of these projects on resources within the Berners Bay watershed, or the contribution that improved access and development would have in this regard. Nor does it adequately address mitigation measures to offset these potential effects. Given the high resource and recreational values of Berners Bay, and the development pressures being placed on it, we recommend that the Forest Service initiate a collaborative effort with the ADOT&PF, the City and Borough of Juneau (CBJ), Gold Belt, and other resource agencies and stakeholders in the creation of a management strategy for Berners Bay. The intent of such a plan would be to guide future decisions in this area and ensure that the cumulative effects of proposed development within the watershed would not result in unintended consequences (such as the loss of attributes that give the entire Berners Bay watershed its resource and aesthetic values).

84.8

The legal framework for a management strategy for Berners Bay may include one or more of the following actions:

- 1) Amendment of the Tongass Land Management Plan.
- 2) Amendment of the Juneau Comprehensive Plan.
- 3) Designation of Berners Bay as an Area which Merits Special Attention under the Alaska Coastal Management Program.
- 4) Designation of Berners Bay as a National Estuarine Research Reserve under the Coastal Zone Management Act.
- 5) Designation of Berners Bay as a National Marine Sanctuary under the Marine Protection, Research and Sanctuaries Act.
- 6) Designation of Berners Bay as a National Estuary under the Clean Water Act.
- 7) Designation of the Berners Bay airshed as a Class I area under the Clean Air Act.
- 8) Designation of the Berners, Lace, Antler or Gilkey Rivers as Wild, Scenic or Recreational Rivers under the Wild and Scenic Rivers Act.

The EIS should consider these possibilities (and other appropriate measures) as a means of offsetting the anticipated cumulative effects in this area. We recommend that the Record of Decision include a joint recommendation or commitment by the lead and cooperating agencies to develop a management strategy for the Berners Bay area.

Additionally, we recommend that the Forest Service consult the January 1997 document issued by the Council on Environmental Quality entitled *Considering Cumulative Effects Under the National Environmental Policy Act* in evaluating the cumulative effects on Berners Bay. We have enclosed a copy for your reference.

Response to Comment 84.8

This EIS discloses cumulative effects of this project and reasonably foreseeable projects in the Berners Bay area. Development of a strategic management plan for the Berners Bay area would more appropriately be done as a Forest Plan amendment and is beyond the scope of this document. Please see response to 64.6.

Site Resources

Berners Bay is considered to be a sensitive environmental area of concern with substantial resource and recreational values. There are serious public concerns that increased access to and development within Berners Bay would alter recreation and resource values and change the character of the area. For these same reasons, the EPA believes that Berners Bay may be an Aquatic Resource of National Importance (ARNI). Our rationale for making this preliminary ARNI determination is presented in the following discussion.

Berners Bay supports a diversity of sensitive and critical habitats important for birds, fish, and wildlife. The steep mountains and icefields ensure isolation of the area, which maintains its pristine and undeveloped character. The large glacially fed systems of the Lace and Antler Rivers drain into Berners Bay, depositing silts and sands forming extensive intertidal mudflats and estuaries. Along with Johnson and Slate Creeks, these rivers support a number of anadromous fish, including pink, chum, coho, sockeye salmon, and dolly varden char, cutthroat and steelhead trout. Estuaries, muskegs, and floodplains adjacent to these rivers are excellent spawning and rearing habitat for fish, as well as habitat for moose, bears, and waterfowl. Coastal old growth forests provide nesting habitat for bald eagles. Based on information presented in the Cascade Point Access Road draft EIS and the Juneau Access Improvements Project draft EIS, wetlands complexes and special aquatic sites within the bay have been rated high for the following functions: surface hydrological control, riparian support, salmonid habitat, disturbance of sensitive wildlife, regional ecological diversity, ecological replacement cost, and potential recreation use.

Estuaries at the mouth of anadromous streams are among the most sensitive habitats. Estuaries provide exceptional productivity as a result of the up welling of nutrient rich deep waters from the Lynn Canal and the large volume of freshwater flowing from the upland drainage of the Lace, Berners, Antler, Sawmill Rivers. The nutrients then become available for use by phytoplankton, which provide food for fish, shellfish, and other marine organisms. Thus, estuaries provide the foundation of most marine food chains and the productivity of the offshore waters

The estuarine wetlands are important for eulachon and other smelts which spawn in the Berners, Lace, and Antler rivers. Juvenile salmon, especially chum and pink salmon, migrate from the rivers to the estuaries soon after emerging from the spawning gravels during their out migration adjustments to saltwater.

In April and May, large concentrations of adult Pacific herring and eulachon migrate and spawn in the Berners Bay area. Pacific herring spawn in vegetated shallows, including areas in the immediate vicinity of Cascade Point. The preferred substrate for herring is eelgrass. Pacific herring and eulachon provide the basis for higher trophic organisms.

Humpback whales migrate into Berners Bay to feed on herring and eulachon. The American Peregrine Falcon feed in these waters during Spring and fall migration. Under the Endangered Species Act, the Humpback whale and the falcon are federally listed as an Endangered species

Response to Comment 84.9

Thank you for the information. Please see the Final EIS, Chapter 3, for a section titled "Berners Bay Resources" which includes this information.

The Stellar Sea lion is federally listed as a Threatened Species. A Stellar Sea lion haulout area has been identified at Point Saint Mary. This area may be designated by the National Marine Fisheries Service as a Critical Habitat Area under the Endangered Species Act.

At the lower elevations, the mudflats provide resting place for harbor seals, and pups during low tide. This area is especially important for harbor seal pups during the spring when eulachon return to the Antler and Lace Rivers to spawn. Sea lions and seals also concentrate in large numbers to feed on Eulachon and herring.

Large concentrations of shorebirds, gulls, and bald eagles forage for eulachon smelt and herring in late April and early May. In particular, large numbers of Bald Eagles concentrate in Berners Bay. In late summer, many eagles congregate along the mouths of the Lace and Antler Rivers to feed on salmon. The old growth coastal fringes of Berners Bay may support nesting sites for Bald Eagles. Bald eagles prefer building their nests in large Sitka spruce trees within 400 meters of the water.

The Queen Charlotte Goshawk, migrate through Berners Bay to feed in summer and fall. Trumpeter swans may use the area for nesting, feeding, and overwintering periods. Other migratory birds may utilize Berners Bay as a staging area.

The mountains and icefields surrounding Berners Bay maintains a small isolated population of moose. The deep snowfall drives the moose population to low elevation shoreline habitats during most winters. The beach fringe and estuary habitats of upper Berners Bay and the Berners, Lace, and Antler rivers are extremely important for moose during wintering and calving periods.

Berners Bay provides for one of the highest quality habitat areas for spring through fall use for black bears. During this time, black bears migrate between the higher elevation dens and the grass flats along the beach. During late summer, black and brown bears congregate along salmon streams to feed.

In southeast Alaska, low-elevation closed old growth forest stands have been identified as essential habitat for the Sitka Black-tailed deer in winter and spring. The deer is the staple prey species for the Gray (Alexander Archipelago) Wolf.

Furthermore, Berners Bay provides important recreational values. Recreational activities include kayaking, hiking, camping, hunting, sport fishing, wildlife viewing, boating, etc., in an undisturbed pristine environment. Currently, the only access to Berners Bay is by plane or boat.

Indirect Effects

We are extremely concerned with the treatment in the EIS of the potential indirect effects that would result with the granting of an road easement by the Forest Service. Section 4 describes elements of the Echo Cove Master Plan and presents a brief discussion of the

Response to Comment 84.10

Please see response to Comment 84.2.

implications of development at Cascade Point (in the context of cumulative effects), yet we were unable to determine the criteria used to determine the reasonably foreseeable activities used in the analyses. Pages 8.5 and 8.6 of the Echo Cove Master Plan present a large number of development options, yet very few are described in the EIS. Consequently, we are concerned that the EIS is not accurately reflecting reasonably foreseeable development at Cascade Point. We recommend that EIS be revised to more accurately reflect information in the Master Plan. Option A in the Master Plan appears to us to be a logical set of outcomes to be used to characterize reasonably foreseeable development at Cascade Point for purposes of evaluation in the EIS.

84.10

Wetlands/Section 404 of the Clean Water Act

We are very concerned by the statement on page 4-8 that "wetlands along the proposed alignment cannot reasonably be avoided," when no alternatives to the proposed action have been identified and evaluated in the draft EIS in a meaningful way. We do not believe that EIS provides sufficient information to demonstrate that the proposed alignment is the least environmentally damaging practicable alternative, a demonstration that is necessary before an Army Corps of Engineers (ACOE) permit can be issued. As part of this demonstration, the EIS must demonstrate that impacts to waters of the United States, including wetlands, have been avoided, minimized, and mitigated, consistent with the Section 404(b)(1) guidelines. We recommend that the Forest Service revise the EIS to include an evaluation of alternatives that would ensure that a road across Forest system land, should it be selected, would be capable of acquiring the necessary ACOE permit. We recommend that the Forest Service coordinate with the ACOE to ensure that the alternatives being considered by both organizations are the same.

84.11

Response to Comment 84.11

Please see response to Comment 29.6 and 29.7. Due to topography and the linear nature of wetlands which typically extend from the steep to slope (historic high tide line) to tidewater, alternatives to completely avoid would require bench construction upslope or construction along the beach. Bench construction would increase project costs considerably, although a cost estimate has not been provided. Beach construction would impact waters of United States, including wetlands near the high tide line, and impacts may be more substantial than those associated with the proposed alignment.

Response to Comment 84.12

Your comment has been noted. Please see the additional beach fringe discussion in the Final EIS, Chapter 1, Existing Management Direction and Chapter 4, Wildlife.

84.12

Response to Comment 84.13

The Corps of Engineers will be conducting their own analysis for their permit. Your comment has been forwarded to them. This information is not needed for the road easement located on uplands.

Consistency with the Tongass Land Management Plan

We were unable to determine if the proposed alignment would comply with the Beach and Estuary Fringe Standards and Guidelines of the 1997 Tongass Land Management Plan (TLMP). BEACH1 provides direction to maintain a 1,000-foot wide beach fringe to provide important habitats, corridors and connectivity of habitat. While the EIS does not indicate if the Alternative B alignment falls within the beach fringe, drawings included in the ACOE Public Notice suggest that it is. BEACH2 indicates that road corridors may be designated within a beach or estuary fringe, when feasible alternatives are not available. Because the EIS does not evaluate alternatives to the proposed action, we are concerned that the Alternative B alignment may not comply with TLMP because the EIS lacks a demonstration that there are no feasible alternatives to the proposed action that would avoid the beach fringe. We recommend that the EIS provide a demonstration that the proposed action is consistent with present management direction for the Tongass.

Herring Spawning Habitat

Pacific Herring is known to spawn within the Lynn Canal area and Berners Bay. The draft EIS indicates the development of the proposed log transfer facility (LTF) on Cascade Point would result in direct impacts to herring spawning habitat, and concludes that the bulkhead would "presumably not impact future spawning activities of Pacific herring." We were unable to find information in the EIS that substantiates the characterization that the LTF would not impact

84.13

84.13 ↑ herring spawning activities. Because the present Lynx Canal herring stocks are currently declining, we believe that it is critical that the EIS include an evaluation of the extent of herring spawning areas (including a delineation of the areal extent of eelgrass beds) in Berners Bay and Lynx Canal and potential impacts to those stocks. Berners Bay, including the area near Cascade Point, may be a critical spawning area for Pacific Herring.

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Actions*

Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

BC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

BO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the draft EIS does not contain sufficient information, data, analyses, or discussions of such a magnitude that they should have full public review. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

RESPONSES TO COMMENTS
Commentor No. 85: Kathy Stepien

Jannette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Dear Jannette:

85.1 I am writing in opposition to the extension of the Glacier Highway in Juneau to Cascade Point in Berner's Bay. This action will have extended, detrimental environmental impacts to Berner's Bay and Juneau and therefore should not be allowed.

85.2 The Forest Service must provide better protection for marten and brown bear populations in the Berner's Bay ecosystem. DEIS projections of approximately 50% declines in these two populations is unacceptable. The decimation of these two populations cannot be justified by the desire for another road. Extension of the road would be yet another example in which humans place more importance on our own "needs" and desires than on the needs and lives of non-human living beings. It is well beyond time to take into account the intrinsic value of non-human nature. Destruction of the marten and brown bear populations is immoral. Destruction of their populations simply because we desire another unnecessary road is unconscionable.

85.3 I am also concerned about the failure of the DEIS to address cumulative effects on wildlife populations and their health, recreation, tourism, and sport and commercial fishing. The cumulative impact of the Kensington and Julien mines with the potential development of private land (which may not occur without the road) must be examined.

85.4 In conclusion, I would like to voice my opposition to this action as proposed. I request that the Forest Service prepare a new DEIS that addresses my concerns and provides the public a better understanding of the environmental impacts of this action.

Sincerely,

Kathy Stepien
Kathy Stepien
Juneau

Response to Comment 85.1

The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 85.2

The Final EIS, Chapter 4, Cumulative Effects, Wildlife discusses possible effects from projects proposed in the area.

Response to Comment 85.3

The Final EIS, Chapter 4, Cumulative Effects, Wildlife and Recreational Activities discusses possible effects from projects proposed in the area.

Response to Comment 85.4

The Final EIS addresses comments received during the public comment period for the Draft EIS.

Friends of Berners Bay

949 Goldbelt
Juneau, AK 99801

February 8, 1998

Janette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. de Leeuw:

The following are comments on the Cascade Point Access Road Draft Environmental Impact Statement. Friends of Berners Bay is a group of Juneau citizens and others that seeks to protect the wildland values of Berners Bay, including its recreational opportunities, solitude, wildlife and scenic values.

The DEIS presents several overall weaknesses that must be addressed before the document can meet its National Environmental Policy Act responsibility to fully inform the public and policy makers of the likely consequences of a pending decision. We will outline those general weaknesses, relating them to particular passages in the text where practicable, and we will also show where specific portions of the document are in error, or otherwise need to be strengthened.

Purpose and Need Inadequate

The purpose and need for this project are questionable and, in any event, insufficiently demonstrated. A single sentence is devoted to this critical aspect of the EIS. It states,

"The purpose of the Proposed Action is to provide Goldbelt, Inc. access across National Forest System land to their private land." (p. 1-4)

The Introduction (p. 1-1) of the DEIS elaborates: "for the purpose of development of their land." The action contemplated in the preferred alternative is treated in every respect as providing a benefit for a sole party, namely, Goldbelt, Inc. However, the agency is charged with managing public lands for public benefit. Although this mandate does not rule out actions which primarily benefit only one party, a benefit to the general public must be shown. How will Goldbelt's gaining access, in particular,

RESPONSES TO COMMENTS

Commentor No. 86: Dana Owen, Friends of Berners Bay

Response to Comment 86.1

We could not find the direction you reference that "the agency is charged with managing public lands for public benefit". Please see response to Comment 64.15 and 76.2 and the Final EIS, Chapter 1, Existing Management Direction.

86.1 ↑ this contemplated road access, work to benefit the public whose resources are being affected? That question must be addressed in the EIS in order to fulfill its NEPA responsibility. Later in our comments, as we examine the methodological shortcomings of the DEIS, we will suggest the proper approach to this question.

Alternatives too Limited

86.2 The DEIS presents only three alternatives: no action, the road as proposed (the preferred alternative), and an access road with no public access (pp. 2-1 and 2-2). A road using no Forest Service land is discussed, but eliminated from study. The rationale for such a decision is weak. While many of the impacts of such a road would be identical, or very similar to the preferred alternative, many others would not. The public and decision makers should have the opportunity to envision such an entirely possible alternative. It should be included in the EIS.

86.3 The analysis of the no action alternative is insufficient. In particular, the DEIS fails to examine the possibility of water-only access. Would Goldbelt be able to develop its lands with only water access? What would be possible given this method of access? What would be likely? What would the impact be of such a development scenario? This possibility deserves examination, but is left out of the DEIS. It should be included in order to present the full range of outcomes of a no action decision.

Scope of Impact too Restricted

Throughout the DEIS, the scope of impact is underestimated, or inadequately described. In most cases, often the most critical ones, the document limits the geographical area of impact to the greatest degree possible, specifically, to the area immediately adjacent to the proposed road. By restricting the area under consideration many of the most important effects of the proposed action are either eliminated from discussion, or relegated to the arena of "Non-Significant Issues," thus rendering the DEIS useless as a meaningful planning and decision tool and putting its NEPA adequacy at risk. A look at the discussion of wildlife impacts will illustrate.

The introduction of Chapter 3, Affected Environment, describes the study area as

"a strip of land beginning near the head of Echo Cove, at the end of Veterans Memorial (Glacier) Highway, and extending northerly approximately three miles to the point in Berners Bay shown on nautical charts as "Cascade."

86.4 Employing this definition, wildlife impacts are thus studied only in the surrounding Alaska Department of Fish and Game Wildlife Analysis Area 2514 (p. 3-6). However, the contemplated action would have an effect far beyond the boundaries of this study

Response to Comment 86.2

The range of alternatives considered in the document was developed based on the Purpose and Need and issues identified during the scoping process. The option of a beach access road was included in the Draft EIS and is included in the Final EIS. Please see the Final EIS, Chapter 2, Alternatives Eliminated from Detailed Study and response to Comment 29.1

Response to Comment 86.3

Please see response to Comment 28.2 and 29.1 and the Final EIS, Chapter 4, Consequences.

Response to Comment 86.4

The Final EIS, Chapter 4, Cumulative Effects, Wildlife discusses possible effects from projects proposed in the area. The potential effects of development at Cascade Point are discussed both as indirect effects of the road easement and as cumulative effects.

area. As we point out in the discussion of purpose and need, the project is joined hip and shoulder to Goldbelt's desire to develop its property. That development could ultimately lead to a community of 500 people at Cascade Point (Environmental Consequences, p. 4-2), in addition to tourist and other types of attractions that will increase the number of people using the Berners Bay area. It is difficult to imagine that number of people inhabiting and visiting without venturing outside the boundaries of the ADF&G study area.

86.4

While some passing reference to a broader geographical impact is made in the discussion of cumulative impacts, the DEIS simply ignores the possibility, indeed the near certainty, that some portion of this population will venture up bay, affecting such areas as Crab Pot Cove, the USFS cabin site, the extensive tidelands at the head of the bay, and most crucially, the rich and productive estuary and river system that drains into Berners Bay. What will be the impact to these important areas? What kinds of pressures can we expect upon areas now prized for solitude, hunting, gathering, and other important values? We cannot know from the DEIS, because, in a glaring NEPA shortcoming, the document fails to inform us.

86.5

This crucial shortcoming affects virtually every aspect of this DEIS. Most especially, sections on environmental consequences, including the issues sections on fish (p. 4-4), recreational activity (p. 4-5), and cultural resources (p. 4-9). In one spectacular egregious case, the DEIS asserts that "No impacts to cultural resources are expected from the proposed action" (p. 4-9). The authors of the DEIS are well aware, or should be, that the area abounds in cultural resources. The Forest Service has in its files previous cultural assessments of the area that would provide a good starting point for evaluating these important resources. These studies are not included in the DEIS, nor even referenced in the bibliography. They should be.

86.6

In a stunning rhetorical slight of hand, the DEIS states that Cecilia Kunz and Rosa Miller, well known local Tlingit elders, know of no "permanent villages, burials or petroglyphs in Echo Cove" (p. 3-12). That may be, but at least one of these women, and probably both, know of many such sites nearby. We are aware of sites within Berners Bay reachable by residents and visitors to Goldbelt's proposed development, but outside the study area, that could easily be threatened by increased use of the bay by the numbers of residents and visitors envisioned by the DEIS. What we lack, because the DEIS fails to provide it, is any understanding of the magnitude of these pressures on cultural resources, and the probable result. This pointed refusal to include resources at risk outside the narrow scope of the study area, and to calculate the impact upon them of the acknowledged potential outcome of the contemplated action, lies at the heart of the failure of this DEIS to meet its NEPA obligations.

86.7

Response to Comment 86.5

Please see Final EIS, Chapter 4, Cumulative Effects for additions to the disclosure of possible cumulative effects to recreation from proposed projects in the area.

Response to Comment 86.6

Please see response to Comment 64.20. The project area of Cascade Point does not abound in cultural resources. Berners Bay was the location of more activities associated with cultural resources. The listing of literature in Chapter 6 was intended to include only references directly referenced in the EIS. The planning record contains many other references.

Response to Comment 86.7

Please see response to Comment 86.6. The indirect impacts to cultural resources in Berners Bay from the construction of the proposed facilities at Cascade Point is not a measurable impact. To speculate impacts to sites beyond the scope of the project area would be to expose site locations within Berners Bay, which the Forest Service is required to protect. The probable effects cannot be measured and, therefore, cannot be reasonably displayed in the EIS. The discussion of cultural resources in the Final EIS has been expanded to discuss effects to archeological sites on a broader scope. The Draft EIS meets its National Environmental Policy Act (NEPA) obligations, but the Final EIS provide more complete information and should clarify some points you have raised.

Traditional Use Not Examined

A related issue is that of traditional use of the area. Similarly to the treatment of cultural resources, the DEIS dismisses its responsibility to examine impacts to traditional uses of the area by local peoples, categorizing all use as "sport and personal" (p. 3-12). The DEIS attempts to obfuscate the issue by declaring that no subsistence use of the area takes place.

The project area is far from rural communities, and there is no evidence that the area is used by those who qualify as subsistence users (p. 3-12).

Residents of the City and Borough of Juneau are classified as non-rural and do not qualify as subsistence users. (p. 4-9)

86.8

This legal nicety simply begs the question. It does not relieve the DEIS of its requirement to study all reasonably foreseeable impacts. How many people continue to harvest traditional foods, medicinal herbs and craft materials? What is the level of this harvest? When does it occur? How important is it to the cultural and spiritual lives of those who participate? Would this activity be altered by the proposed action? At what cost to the people involved? Many such questions suggest themselves. An entire crucial line of inquiry has been left out of the DEIS. By ignoring current traditional uses, whether or not they qualify as subsistence, the DEIS fails to present decision makers and the public with an adequate description of the resources at risk and the impact of the proposed action.

Impacts to Existing Road System and the CBJ

While contemplating the possible construction of a village housing as many as 500 people, the DEIS omits any mention of the impact to the road system and its attendant recreational resources. The document alludes to facilities that would, in all likelihood, provide an attraction for visitors and residents of Juneau. A public viewpoint of Berners Bay, Lynn Canal and the Chilkat range (p. 4-19), a possible ferry terminal (p. 2-1), and a lodge (p. 2-1) are among the possible draws. However, no attempt is made to quantify the number of people attracted or at what times of the year, week or day. What is the likely affect of increased visitors and residents to the road system? Is it capable of handling such traffic safely? Will the road surface need to be improved? At what cost? To whom? What will be the likely impact to existing roadside recreation, such as beachcombing, berry picking, hiking, picnicking, fishing? What services will the increased visitation and residency require? Police? Fire protection? Emergency services? Schools? Sewer and water? What will be the cost? To whom? The EIS has an obligation to examine these potential affects and to compare costs and benefits accruing as a result of reasonably foreseeable actions linked to the proposed project.

86.9

4

Response to Comment 86.8

The documentation of traditional uses indicates that Berners Bay was used for berry picking but no use was mentioned specifically to this project area in Echo Cove. No specific information came out about the project area in the interviews of either Cecilia Kunz or Rosa Miller. When Wallace M. Olson interviewed Rosa Miller in June 1996 and asked specifically if there were any permanent villages or burials in the Echo Cove area, she said that as far as she knew there were not. Ms. Miller did indicate that Echo Cove was used as a stopover for berry picking on the way to Berners Bay. Additionally, it could be surmised that someone was collecting the hemlock bark for the sux' along the road corridor and also in the Goldbelt, Inc. development area given the number of hemlock CMTs. However, this is a historical rather than current use of the project area. Future residents at Cascade Point could, themselves, be local users of the resources.

Response to Comment 86.9

The issues you described are items addressed by the local planning process. The City and Borough of Juneau (CBJ) has designated the lands at Echo Cove as a "New Growth Area" in their Comprehensive Plan. It is reasonable to assume that municipal plans for infrastructure and utilities are designed to accommodate this use. The CBJ is responsible for services.

Cascade Point DEIS Comments
Friends of Berners Bay
2/8/98

Thank you for the opportunity to provide these comments. We look forward to participating further as the public process unfolds.

Sincerely,


Dana Owen
Co-Chair

copy: SEACC
Earth Justice Legal Defense Fund

JOHN A. SANDOR, Box 21135, Juneau, AK 99802-1135; jsandor@ptialaska.net
(907) 586-2497; Fax: (907) 586-2490; Web: <http://www.ptialaska.net/~jsandor/>

February 9, 1998

TO: Juneau Ranger District c/o Jeanette de Leeuw FAX: 586-8808

FROM: John A. Sandor

SUBJECT: Proposed 2.5 Mile Access Road to Cascade Point

The following are my comments regarding the proposed 2.5 mile Access Road to Cascade Point through Gold Belt selected lands near Echo Cove.

1. I endorse the Proposed Action B (Preferred Alternative), because it is consistent with the long-range Forest Service land management plans as well as the Comprehensive Plan developed by the City and Borough of Juneau.

2. The Forest Service's evaluation of alternatives have identified and addressed the project impacts and the mitigation actions planned are appropriate for the various environmental values of this area.

3. Gold Belt Corporation has proven to be a responsible manager of land, water and cultural resources, and this development will be of benefit to the City and Borough of Juneau as well as to Gold Belt shareholders.

4. I would also add that I and many other residents of this area look forward to the improved public access to the resources of the area involved.

Thank you for the opportunity to comment in support of this proposed access road.

cc: jsandor

RESPONSES TO COMMENTS
Commentor No. 87: John A. Sandor

Response to Comment 87.1

Please see response to Comment 14.1.

Response to Comment 87.2

Thank you for your comment.

Response to Comment 87.3

Thank you for your comment.

Response to Comment 87.4

Thank you for your comment.

2670 Frith Cove Rd.
Juneau, AK 99801
February 7, 1993

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Rd.
Juneau, AK 99801

RECEIVED

FEB 09 1993

Juneau Ranger
District

Dear Ms. de Leeuw:

- 88.1 We are writing this letter to voice our strong opposition to the proposed Cascade Point Access Road project in Barrow Bay. Of the alternatives given in the Draft Environmental Impact Statement, we support Alternative A -- No Action. Reasons for our opinion follow:
- 88.2 Initially the road would result in the construction of a dock and a village. Before long the village would evolve into Goldbelt City with all the environmental, social and economic problems inherent in urbanization. We suspect that many of the people living there would not like it and they would spend their free time driving to and from Juneau where the discount shopping, essential services and cultural activities are. This would increase traffic on Glacier Highway much of which is in poor repair and is already heavily used on weekends. To be sure, the dock and village might be constructed even if the road were not. But the presence of the road would insure the development of those facilities.
- 88.3 Secondly, the road and resulting facilities would diminish the quality of the remainder of Barrow

Response to Comment 88.1

The Forest Service Record of Decision provides the rationale for the selected alternative.

Response to Comment 88.2

The maintenance of the North Glacier Highway is outside the scope of this EIS. As with all state roads, the Alaska Department of Transportation would be responsible for maintenance and planning for use of North Glacier Highway.

Response to Comment 88.3

Please see responses to Comments 4.1 and 76.2. The Final EIS, Chapter 4 Cumulative Effects, Recreational Activities discusses possible effects from projects proposed in the area. The Forest Service Record of Decision provides the rationale for the selected alternative.

88.3 [↑] Bay as a recreation area. Berners Bay is a special place. It is special because it is beautiful, well stocked with wildlife, within the reach of most peninsulas and is essentially a wilderness. Because it is special, it has been designated a Roadless Area. Many people from peninsulas now use the area for boating, hiking, hunting, fishing and flying, but the most important reason they use it is because it is a wilderness. If the road and village are built, the wilderness will soon disappear.

88.4 [↑] Further, there would be detrimental effects on wildlife. The presentation of information on wildlife on pages 4-2 and 4-3 in the DEIS is unclear and misleading. For Alternative A--No Action, a reduction of 22% for brown bears, 2% for black bears, <1% for mountain goats and 13% for martens is listed. The reader might understandably ask "How can you have a reduction in wildlife if there is 'No Action'?" On closer examination one discovers you are assuming "limited development" with no road access. Then under Alternative B--Proposed Action, a reduction of 1% for brown bears, 4% for black bears, <1% for mountain goats and 10% for martens is listed. Again this is misleading because here the reductions are due to road construction and use only and don't include effects of the village. What should have been done is that zero reduction

Response to Comment 88.4

Please see response to Comment 19.1.

88.4 should have been listed under Alternative A and the two sets of data combined and listed under Alternative B i.e. a reduction of 23% for brown bears, 6% for black bears, < 2% for mountain goats and 23% for marten. These reductions in wildlife caused by the road and facility are considerable and unacceptable to us.

88.5 The most compelling argument against constructing the road is that it would be the first segment in a road from Juneau to Skagway. The process is, of course, incrementalism. If this road is built, then the Kensington Mine people would push for another extension of the road to their facilities so they could ship their ore by truck and their workers could drive to Coatsco. Following that, another mine or whatever farther north would want a connection and after 10 or 15 years there would be a road to Skagway. The best information we have is that most people in Juneau, Skagway and Haines don't want the road. Yes, we know the proponents of the road also claim they have the majority on their side. Let's look at the facts: The Mc Dowell Group's public opinion survey (DOT, DEIS, Appendix C) revealed that 56% of Juneau households favored options other than a road while only 42% favored a road. Also, public testimony at the December 8, 1997 meeting in the

Response to Comment 88.5

These comments are beyond the scope of this project and are more appropriate for the Juneau Access Improvements project; we have forwarded your comments to Alaska DOT.

88.5 Juncos Assembly Chambers was 3 to 1 against the road. Further, letters to the editor and "My Turn" articles in the Juncos Empire from September 1, 1997 to February 6, 1998 were 2.8 to 1 against the road. These data don't prove that the majority of people in Juncos are against the road, but they strongly suggest this is so.

88.6 In summary, we urge you not to permit the construction of a road from Echo^{Con} to Goldbelt property over Forest Service land. That road would be the first increment of a road from Juncos to Skagway which is likely opposed by the majority of Juncos residents. Also, it would be the first of a sequence of events that would destroy Barners Bay as a wilderness recreation area.

Response to Comment 88.6

The Forest Service Record of Decision provides the rationale for the selected alternative.

Sincerely,
Richard Hard
Sylvia L. David

RECEIVED

FEB 09 1998

Juneau Ranger
District

Patty Ann Polley
535 Harris Street
Juneau, AK 99801
907 586-6185

February 9, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. De Leeuw:

89.1 I support the Proposed Action B as included in the
Cascade Point Access Road DEIS.

89.2 Private property owners need to have reasonable access
to their lands, only a small portion of the land is planned
for development. The City and Borough of Juneau has
included this area in its comprehensive plan for development
and it is designated a "New Growth Area."

89.3 Goldbelt, Inc. has a proven record relating to
development in a sensitive environment and will work to
minimize effects of its proposed development.

89.4 The proposal will help in providing marine
transportation possibilities in the northern region of Lynn
Canal.

89.5 I urge you to grant Goldbelt, Inc. the road easement
for construction, operation and maintenance of a road on
National Forest System land.

Sincerely,



Patty Ann Polley

RESPONSES TO COMMENTS
Commentor No. 89: Patty Ann Polley

Response to Comment 89.1

Thank you for your comment.

Response to Comment 89.2

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority and policy regarding access to private land.

Response to Comment 89.3

Please see response to Comment 14.2.

Response to Comment 89.4

Thank you for your comment.

Response to Comment 89.5

Please see response to Comment 14.1.

Response to Comment 89.6

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

RECEIVED

FEB 09 1998

Juneau Ranger
District

January 30, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. De Leeuw:

Please accept the following comments in support of Golbelt's proposed road to Cascade Point. I support the USFS preferred alternative B because it will allow the development of private property, and because it's a development that will benefit the community.

Not only will the Cascade Point development offer services to recreational enthusiasts, it will also offer high speed ferry service to Haines and Skagway. With lethal budget cuts to the Marine Highway System, and already inadequate service to southeast communities, we will have to look to the private sector to satisfy our marine transportation needs. One of the complaints I've heard from residents of Haines, Skagway and Juneau (and that I share myself) is that there is no boat scheduled allowing day trips between these ports. A high speed passenger boat would accommodate this demand. Golbelt could also help to fill other gaps in the service provided by the Marine Highway System.

The Cascade Point development and its proposed road have been thoroughly studied, the impacts assessed, and appropriate mitigation for impacts devised. I am comfortable with the efforts made to ensure this project will have the least impact and the greatest benefit to the community.

Very Truly Yours,

Jennifer Black

RESPONSES TO COMMENTS
Commentor No. 90: Jennifer Black

Response to Comment 90.1

Thank you for your comment.

Response to Comment 90.2

Please see response to Comment 14.1.

Response to Comment 90.3

Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 91: Karen K. Doxey

February 4, 1998

Karen K. Doxey
3814 Killewich Drive
Juneau, Alaska 99801

RECEIVED

FEB 09 1998

**Juneau Ranger
District**

Jennette de Leeuw
USDA Forest Service
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Dear Ms. de Leeuw:

I am a property owner and long-term resident of Juneau. I am familiar with the need to improve transportation access to and from the communities of northern Southeast Alaska.

I support the proposal by Goldbelt, Incorporated for an access road to, and the potential development of, Cascade Point. The proposal is consistent with the Comprehensive Plan adopted by the City and Borough of Juneau and the Goldbelt lands are designated as a "New Growth Area" in the Comprehensive Plan.

Even though we are not shareholders, my children and I have enjoyed the recreation throughout Echo Cove for many years. I think all of the potential project impacts have been identified and addressed by Goldbelt. The extent of growth anticipated minimizes the direct impacts to Echo Cove and the mitigation measures Goldbelt proposes are appropriate and responsible.

Goldbelt has already demonstrated its ability to operate responsibly in sensitive areas by its 1997 helicopter logging projects at Echo Cove and West Douglas.

The development proposed at Cascade Point will enable more efficient and improved marine transportation services to Skagway and Haines. In view of recent changes to the Alaska Marine Highway System, this project will benefit the people of all of Southeast Alaska.

I encourage the Forest Service to issue a favorable decision for the preferred alternative for Goldbelt to build and operate an access road to Cascade Point.

For the record I have a degree in Environmental Studies.

Thank you for this opportunity to comment.

Sincerely,

Karen K. Doxey
Karen K. Doxey

Response to Comment 91.1

Please see response to Comment 14.2.

Response to Comment 91.2

Thank you for your comment.

Response to Comment 91.3

Thank you for your comment.

Response to Comment 91.4

Please see response to Comment 14.1.

Response to Comment 91.5

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

RECEIVED

FEB 09 1998

Juneau Ranger
District

William G. Brock
9 Westridge, 300 Hermit St.
Juneau, Alaska 99801
(907) 586-3763

February 6, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Re: Cascade Point Access Road

Dear Ms. De Leeuw:

92.1 I am writing in support of "Proposed Action B", the Forest Service Preferred Alternative for this project.

92.2 As proposed, this alternative is consistent with both the City and Borough Comprehensive Plan and the apparent intent which left this road corridor, through what are otherwise private lands, in the hands of the Forest Service.

92.3 The time has come for responsible development of Goldbelt's valuable holdings in the area. This is not only a matter of fairness to the private landowner, but a logical and desirable step in development of City and Borough infrastructure. The planned development impacts only a small segment of Goldbelt's property in the area. Moreover, it provides a unique opportunity for expanding marine transportation alternatives in Northern Lynn Canal and deserves Forest Service support and cooperation.

92.4 Once again, I urge approval of "Proposed Action B".

Sincerely,



William G. Brock

Response to Comment 92.1

Thank you for your comment.

Response to Comment 92.2

Please see responses to Comments 14.2 and 14.3.

Response to Comment 92.3

Please see responses to Comments 14.1 and 14.4

Response to Comment 92.4

Thank you for your comment.

RESPONSES TO COMMENTS
Commentor No. 93: Dale Henkins

Dale Henkins
P.O. Box 240261
Douglas, AK 99824

RECEIVED

February 6, 1998

FEB 09 1998

Jennette de Leeuw
USDA Forest Service
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Juneau Ranger
District

Dear Ms. de Leeuw:

93.1 As a long-term resident I am familiar with the need to improve transportation access to and from the communities of northern Southeast Alaska.

93.2 I support the proposal by Goldbelt, Incorporated for an access road to, and the potential development of, Cascade Point. The proposal is consistent with the Comprehensive Plan adopted by the City and Borough of Juneau and Goldbelt lands have been designated as a "New Growth Area" in the Comprehensive Plan since 1984.

93.3 As a geologist I think all of the project impacts have been identified and addressed. The overall growth envisioned by Goldbelt minimizes direct impacts to Echo Cove and the mitigation measures they propose are appropriate and responsible.


93.4 Overall, the private land proposed for eventual development by Goldbelt is only about 10% of their land. Goldbelt has already proven its ability to operate responsibly in sensitive areas by its 1997 helicopter logging projects at Echo cove and West Douglas.

93.5 The development proposed at Cascade Point will enable more efficient and improved marine transportation services to Skagway and Haines. In view of recent changes to the Alaska Marine Highway System, this project will certainly benefit all of the communities in northern Lynn Canal.

93.6 The responsible development of private land should not be unreasonably restricted, but rather it should be fostered.

93.7 I encourage the Forest Service to issue a favorable decision for the preferred alternative for Goldbelt to build and operate an access road to Cascade Point.

Thank you for this opportunity to comment.

Sincerely,

Dale Henkins

Response to Comment 93.1

Thank you for your comment.

Response to Comment 93.2

Please see response to Comment 14.2.

Response to Comment 93.3

Thank you for your comment.

Response to Comment 93.4

Please see response to Comment 14.3.

Response to Comment 93.5

Please see response to Comment 14.1.

Response to Comment 93.6

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority and policy regarding access to private land.

Response to Comment 93.7

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

RECEIVED

FEB 09 1990

Juneau Ranger
District

2.9.98

Jennette de Jeau
Juneau Ranger District
8465 Old Daring Road
Juneau.

Ms de Jeau -

RE: Cascade Point Access Road DEIS

I feel that for the U.S. Forest Service planning and permitting process it is extremely important to study and review all the Cascade Point development. The development and potential impacts must be part of the direct impact of the road.

There seems to be some "big" pictures for Echo Cove/Beeman Bay floating around. Addressing impacts from planned development and/or potential impacts is a must for any thought of extending the roadway.

Thank You.

Tim Moore
1117 "A" St.
Juneau 99801

Response to Comment 94.1

Thank you for your comment. Please see response to Comment 11.4.

Response to Comment 94.2

The Final EIS, Chapter 4, Cumulative Effects discloses possible effects from projects proposed in the area.

RESPONSES TO COMMENTS
Commentor No. 95: Fred Morino

Feb. 6 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, Alaska 99801

Subject: Cascade Point Access Road DEIS Road to Private Land

Dear Jennette:

Thank you for the opportunity to express my thoughts on the above request. I believe that Goldbelt should be allowed to construct a road to their private properties. These peoples have been in this area for ten's of thousands of years and were allowed these properties by federal action. Access to their lands is a question of justice. Please allow them to utilize there properties by supporting there request for access.

95.1

The location is removed from any large population base and there are only positive foreseeable cumulative effects from the proposed usage.

95.2

Thank you for your positive involvement in the development of these private lands.

95.3

Response to Comment 95.1

Please see the Final EIS, Chapter 1, Existing Management Direction for Forest Service authority and policy regarding access to private land.

Response to Comment 95.2

Please see the Final EIS, Chapter 4, Cumulative Effects for a discussion of the cumulative effects of this project.

Response to Comment 95.3

Thank you for your comments.

Sincerely



Fred Morino

RECEIVED

FEB 09 1998
JUNEAU RANGER DISTRICT

RESPONSES TO COMMENTS
Commentor No. 96: Daren Case

January 31, 1998

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

Dear Ms. De Leeuw:

I have reviewed the draft EIS for Goldbelt's proposed development at Echo Cove and am left with the conclusion that the project impacts have been carefully evaluated and mitigation appropriately designed. There is no reason, therefore, to prevent land access to this development.

96.1

Response to Comment 96.1

Thank you for your comment.

Response to Comment 96.2

Please see response to Comment 14.2.

Response to Comment 96.3

Please see the Forest Service Record of Decision for the selected alternative and rationale for the decision.

96.2

The road access proposed is consistent with the CBJ 1984 Comprehensive Plan, which designated the Echo Cove land a "new growth area." Thus, since 1984 it has been the CBJ policy to encourage some growth in this area. By providing road access, the USFS will allow Goldbelt to give the area the "new growth" that the CBJ policy makers envisioned.

Furthermore, if there is to be new growth in Berners Bay, the community that Goldbelt proposes is consistent with the present use of Berners Bay as a recreational area. The Goldbelt facilities will increase access to, and use of, Berners Bay for boating, fishing, hunting, hiking, beach combing, etc. There will be services, camping, and other housing accommodations that will afford better use of the recreational opportunities there.

The development at Cascade Point will provide enormous community gains with very little negative impact. The Forest Service should therefore approve the 2.5 mile road.

96.3

Very Truly Yours,

Daren L Case

Daren Case
4528 Resedale St.
Juneau, AK 99801



8800 Glacier Highway, Suite 112 1/2 ♦ Juneau AK 99801

(907) 790-4601 ♦ Fax (907) 790-4602
February 9, 1998

RECEIVED

Jennette de Leeuw
Juneau Ranger District
8465 Old Dairy Road
Juneau, AK 99801

FEB 09 1998
Juneau Ranger
District

Dear Ms. de Leeuw:


The Juneau Chamber of Commerce supports the construction of the proposed access road and potential Cascade Point development as proposed in the DEIS. The proposed road allows access to private property owned by Goldbelt, Inc. Goldbelt already owns most of the land for the access and only a small segment of the proposed road would cross public lands. Access to private property is a very different access issue than that to publicly owned property and access to privately owned property should not be unreasonable restricted.

The proposal by Goldbelt, Inc. minimizes the direct development impacts to Echo Bay. The proposal is for the development of about 10% of the land, only a very small portion of the property that Goldbelt owns in the area. Goldbelt has shown that it is sensitive to the development of the area by the small portion that is proposed for development.

The City and Borough of Juneau has included potential development at Cascade Point within its Comprehensive Plan and the Goldbelt Echo Bay land has been designated a "New Growth Area."

We support the Proposed Action B as the preferred alternative for the Cascade Point Access Road.

Sincerely,


Bruce Abel
President

E mail: jchcomm@ptialaska.net ♦ Juneaucc@ptialaska.net ♦ Web site: <http://www.ptialaska.net/~juneaucc>

97.1

97.2

97.3

RESPONSES TO COMMENTS
Commentor No. 97: Bruce Abel, President
Juneau Chamber of Commerce

Response to Comment 97.1

Thank you for your comment. Please also see response to Comment 14.4.

Response to Comment 97.2

Please see response to Comment 14.2.

Response to Comment 97.3

The Forest Service Record of Decision provides the rationale for the selected alternative.

